

# Exhibit A

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IN THE MATTER OF INDEPENDENT INVESTIGATION

UNDER EXECUTIVE LAW 63(8)

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May 26, 2021  
10:05 a.m.

VIDEOCONFERENCE INVESTIGATION of  
CHARLOTTE BENNETT, taken by The New York  
Attorney General's Office pursuant to  
Notice, held via Zoom videoconference,  
before Wayne Hock, a Notary Public of the  
State of New York.

A P P E A R A N C E S:

CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006

BY: JOON R. KIM, ESQ.  
(via videoconference)  
JENNIFER KENNEDY PARK, ESQ.  
(via videoconference)

VLADECK, RASKIN & CLARK, PC  
Attorneys Representing the New York  
State Attorney General's Office  
565 Fifth Avenue  
New York, New York 10017

BY: ANNE L. CLARK, ESQ.  
(via videoconference)  
EMILY G. MILLER, ESQ.  
(via videoconference)

KATZ, MARSHALL & BANKS, LLP  
Attorneys for WITNESS  
1718 Connecticut Avenue, NW  
Washington, D.C. 20009

BY: DEBRA S. KATZ, ESQ.

ALSO PRESENT:

TOM DEVINE, Videographer  
(via videoconference)

\* \* \*

1  
2 THE VIDEOGRAPHER: Good morning.  
3 We're going on the record at 10:05  
4 a.m. on May 26, 2021.

5 This is media unit one of the  
6 video recorded deposition of witness  
7 of May 26, 2021 in the matter of  
8 Independent Investigation Under  
9 Executive Law 63(8).

10 This deposition is being held  
11 online as a Zoom videoconference with  
12 all parties appearing remotely.

13 My name IS Thomas Devine from  
14 the firm Veritext New York, and I am  
15 the videographer.

16 The court reporter is Wayne Hock  
17 also with Veritext New York.

18 I am not authorized to  
19 administer an oath, I am not related  
20 to any party in this action, nor am I  
21 financially interested in the outcome.

22 Counsel appearing remotely will  
23 now state their appearances and  
24 affiliations for the record.

25 If there are any objections to

1  
2 proceeding, please state them at the  
3 time of your appearance, beginning  
4 with the noticing attorney.

5 After appearances have been  
6 noted, the court reporter will swear  
7 in the witness and we may proceed.

8 MS. CLARK: Hi, I'm Anne Clark,  
9 I'm with the law firm of Vladeck,  
10 Raskin and Clark, but I'm appearing  
11 today as special deputy to the First  
12 Deputy Attorney General.

13 Joon?

14 MR. KIM: Hi, I'm Joon Kim from  
15 the law firm of Cleary Gottlieb. Like  
16 Anne, I'm appearing as a special  
17 assistant to the First Deputy Attorney  
18 General in this investigation.

19 MS. CLARK: Emily?

20 MS. MILLER: Hi, I'm Emily  
21 Miller. I'm with the law firm of  
22 Vladeck, Raskin and Clark, and like  
23 Anne and Joon, I'm appearing with the  
24 Attorney General's investigation.

25 MS. CLARK: And Debra?

1

2

3

4

5

6

MS. KATZ: I'm Debra Katz with  
the law firm of Katz, Marshall and  
Banks in Washington, D.C. and  
appearing on behalf of Charlotte  
Bennett this morning.

7

MS. CLARK: Okay.

8

You can swear the witness.

9

10

11

12

13

C H A R L O T T E     B E N N E T T, having  
been first duly sworn by a  
Notary Public of the State of  
New York, upon being examined,  
testified as follows:

14

EXAMINATION BY

15

MS. CLARK:

16

Q.        Okay.

17

18

19

20

21

Good morning. Thank you for  
meeting with us today. As I just said, my  
name is Anne Clark, and I have been  
appointed as special deputy to the First  
Deputy Attorney General.

22

23

24

25

The Attorney General has  
appointed my law firm Vladeck, Raskin and  
Clark and the law firm of Cleary,  
Gottlieb, Steen and Hamilton to conduct an

1 C. Bennett

2 independent investigation under New York  
3 Executive Law Section 63(8) into  
4 allegations of sexual harassment brought  
5 against Governor Andrew Cuomo as well as  
6 the surrounding circumstances.

7 As was noted, we are being video  
8 recorded today.

9 You are also under oath, which  
10 means you must testify accurately and  
11 truthfully, just as if you were sitting in  
12 front of a judge or jury, and your  
13 testimony is subject to penalty of  
14 perjury.

15 At the end I'll remind you if  
16 you want to make a sworn statement to  
17 address anything that we didn't cover that  
18 you'd like on the record, we'll give you  
19 an opportunity to do that.

20 This is a civil investigation,  
21 but we just have to put you on notice that  
22 the Attorney General's office also has  
23 criminal enforcement powers, so if at any  
24 point you want to refuse to answer a  
25 question that would incriminate you, you

1 C. Bennett

2 may do so. Failure to answer a question  
3 can be held against you in a civil  
4 proceedings, not in a criminal proceeding.

5 You are appearing today with  
6 your attorney present. You may consult  
7 with your attorney about privileged  
8 matters, but otherwise she is here to just  
9 observe and be there if you need to talk  
10 to her.

11 We have a court reporter with us  
12 today virtually, and as he noted, he needs  
13 to take down everything that we're saying.  
14 So, as he said, it is very important that  
15 we not speak over each other. It can be  
16 hard to do. I will do my very best to  
17 wait until you finished talking before I  
18 ask my next question. When I'm asking a  
19 question, even if you think you know where  
20 I'm headed, just wait until I get the  
21 whole question out.

22 If you don't understand a  
23 question that I ask, let me know and I'll  
24 try to rephrase it in a way that makes  
25 more sense.



1 C. Bennett

2 You are not going to be given a  
3 transcript of this and a chance to review  
4 it, but if, during the course of the day,  
5 you remember that something you said  
6 earlier isn't fully accurate or you  
7 remember some additional information, for  
8 example if we're talking about somebody's  
9 name and you don't remember it when we're  
10 first talking about it, if you remember it  
11 later, feel free to just say, oh, I just  
12 remembered that person was John Smith.

13 If I ask you about details that  
14 you don't recall, if you can approximate  
15 -- so if it's a name and you remember the  
16 first name but not the last name, that's  
17 great, or if it's a date, if you remember  
18 approximately when it happened, the more  
19 specific it can be the better, but we  
20 don't want you to guess.

21 We will take breaks. Any time  
22 you need a break, just say so. I want you  
23 to answer whatever question is pending,  
24 but we can take breaks as often as you'd  
25 like.

1 C. Bennett

2 I know you were in the room with  
3 us --

4 MS. CLARK: Debbie, is anyone in  
5 the room with you?

6 MS. KATZ: No.

7 MS. CLARK: And then we also want  
8 to confirm that nobody is using any  
9 technology to make their own  
10 recording. We're making a recording,  
11 but neither you, Charlotte, nor  
12 Debbie, you aren't doing anything to  
13 record today's proceedings; is that  
14 correct?

15 MS. KATZ: That's correct.

16 Q. And then we need to advise you  
17 that you should not be during breaks  
18 telling anyone what's going on outside of  
19 these proceedings. And I just want to  
20 advise you that, under Executive  
21 Law 63(8), the provision under which we're  
22 doing the investigation, you and your  
23 attorney should not be telling anyone what  
24 we discuss today. Obviously you can and  
25 have talked about the underlying events,

1 C. Bennett

2 but in terms of what subjects we touched  
3 upon, that is to be kept confidential. If  
4 anyone asks you what we talked about, you  
5 should let us know and we will address  
6 that.

7 Are you taking any medication  
8 that would affect your ability to testify  
9 accurately and truthfully today?

10 A. No.

11 Q. Have you had any alcohol today?

12 A. No.

13 Q. Is there any other reason why  
14 you couldn't testify accurately and  
15 truthfully today?

16 A. No.

17 Q. For the record, could you state  
18 your name, date of birth, and current home  
19 and business addresses.

20 A. My name is Charlotte Bennett. I  
21 was born [REDACTED] [REDACTED] [REDACTED].

22 My current address is [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED] [REDACTED], and I list

24 also my parents' home address, [REDACTED]

25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

1 C. Bennett

2 Q. Are you currently working  
3 anywhere?

4 A. I am fully remote permanently.

5 Q. Have you ever given testimony  
6 before in either a deposition or any sort  
7 of trial or arbitration or anything like  
8 that?

9 A. No.

10 Q. Other than speaking with your  
11 attorney, have you done anything to  
12 prepare for today's testimony?

13 A. Review my documents, the ones  
14 that we handed to you.

15 Q. And have you spoken with anyone  
16 other than your attorney about what you're  
17 going to say today?

18 A. No.

19 Q. We'll start by just going over  
20 some background.

21 Did you attend college?

22 A. Yes.

23 Q. What college did you attend?

24 A. Hamilton College.

25 Q. And did you receive a degree

1 C. Bennett

2 from Hamilton?

3 A. Yes.

4 Q. In what?

5 A. Women's and gender studies.

6 Q. What year did you get your  
7 degree?

8 A. 2017.

9 Q. And why don't you just walk us  
10 through your employment history from  
11 college until you came to work for the  
12 State of New York.

13 A. My first job out of college was  
14 an internship at Cornerstone Government  
15 Affairs in Washington, D.C. I was hired  
16 by that firm as an associate in December  
17 of 2017. I worked as an associate in  
18 public health until I left the firm in the  
19 fall of 2018. And then I was hired by the  
20 Cuomo Administration in -- officially in  
21 January, 2019.

22 Q. And how did you come to work for  
23 the Cuomo Administration?

24 A. The firm I had left was in  
25 contact with a former client that was now

1 C. Bennett

2 working in the Cuomo Administration, and  
3 they were looking for resumés.

4 Q. And who is the former client?

5 A. [REDACTED] [REDACTED] [REDACTED].

6 Q. And to whom did you send your  
7 resumé?

8 A. [REDACTED] [REDACTED].

9 Q. And what was her role?

10 A. She was a lobbyist at

11 [REDACTED] [REDACTED] [REDACTED].

12 Q. And were you applying for any  
13 specific position, or just passing along  
14 your resumé? What was your intention when  
15 you sent it to her?

16 A. Passing along a resumé.

17 Q. And what was the next thing that  
18 happened in connection with you going to  
19 work for the Cuomo Administration?

20 A. I was e-mailed by [REDACTED]  
21 [REDACTED], a staffer for the Cuomo  
22 Administration, and he wanted to talk on  
23 the phone about a specific position that  
24 they were interested in filling.

25 Q. And what was that position?

1 C. Bennett

2 A. Briefer.

3 Q. And did he tell you what being a  
4 briefer involved?

5 A. On the phone when we spoke, yes.

6 Q. What did he tell you the role of  
7 a briefer was?

8 A. He didn't have much contact with  
9 the briefing team, so his description was  
10 relatively brief and I wouldn't say  
11 particularly accurate. He seemed to  
12 appreciate that I lived close to the  
13 Governor's house in Mount Kisco. He  
14 explained that part of the job would  
15 potentially be driving to his house to  
16 drop materials off, and even in that first  
17 introductory phone call mentioned that  
18 maybe they will provide me with a printer  
19 at my house in case I need to provide him  
20 materials from my parents' house in  
21 [REDACTED] to his house in Mount Kisco. He  
22 described the larger job description as  
23 providing a daily book of materials to the  
24 Governor, staying on top of his schedule,  
25 and information gathering.

1 C. Bennett

2 Q. And you said he didn't seem that  
3 familiar with the role of briefer.

4 What was his role?

5 A. It wasn't so much that he wasn't  
6 familiar, but when I started the job, it  
7 was clear that everyone was confused why  
8 my interview was with him originally, and  
9 that he didn't really work alongside the  
10 briefing team and they didn't understand  
11 what he had described on the phone,  
12 because they don't.

13 (Whereupon Ms. Kennedy Park  
14 entered the proceedings)

15 Q. What was it that his role was?  
16 What did he do?

17 A. He was on one of the policy  
18 teams. He worked under David Yassky, who  
19 was the policy lead in the office.

20 Q. And after you spoke with him,  
21 did you interview with anyone else before  
22 he offered you the job?

23 A. I scheduled an interview with  
24 Jill Desrosiers. Late December I went to  
25 the office 633 and had an interview with



1 C. Bennett

2 Jill Desrosiers and [REDACTED] [REDACTED].

3 Q. And what were their roles?

4 A. Jill Desrosiers was the chief of  
5 staff, and [REDACTED] [REDACTED] was -- I don't  
6 remember her particular title, but she  
7 handled appointments.

8 Q. And did they tell you anything  
9 about what the role was that you were  
10 being considered for?

11 A. They explained a little bit, but  
12 I don't remember in particular detail.

13 Q. And after you interviewed with  
14 them, did you interview with anyone else  
15 before being offered the position?

16 A. No.

17 Q. And who made you the offer?

18 A. [REDACTED] [REDACTED] called me.

19 Q. And did you accept right away,  
20 or did you take some time to think about  
21 it?

22 A. I accepted immediately.

23 Q. And after you started the  
24 process of interviewing for this job, did  
25 you talk to anyone outside of those you

1 C. Bennett

2 interviewed with about what it was like to  
3 work for the administration or in the  
4 Executive Chamber?

5 A. I spoke again with [REDACTED]  
6 [REDACTED] as a part of my onboarding and  
7 background check process. He told me to  
8 see all the doctors that I could before my  
9 start date, and that was the only  
10 indication before working in the  
11 administration. He indicated that I would  
12 not have time to go to the doctor, and  
13 that to me sent a very strong message.

14 Q. Did you ask anyone else about  
15 what the schedule was like after he made  
16 that comment to you?

17 A. Not that I can remember right  
18 now.

19 Q. So you said you started in  
20 January, 2019; correct?

21 A. Correct.

22 Q. And where were you based?

23 A. New York City.

24 Q. And the offices at 633 Third  
25 Avenue?

1 C. Bennett

2 A. Correct.

3 Q. Where was your office when you  
4 were a briefer?

5 A. I originally started on the  
6 thirty-eighth floor. I had a cubicle just  
7 on the thirty-eighth floor from January,  
8 2019 when I started until May, 2019.

9 Q. And where was the Governor's  
10 office located?

11 A. The thirty-ninth floor.

12 Q. And who did you sit near when  
13 you were on the thirty-eighth floor?

14 A. I sat near the other briefer,  
15 [REDACTED], [REDACTED], who at the  
16 time was on the advanced team, and [REDACTED]  
17 [REDACTED], so -- I may have gotten her name  
18 wrong. She at the time was on the  
19 advanced team.

20 Q. And you mentioned [REDACTED]  
21 [REDACTED].

22 Were the two of you the only two  
23 briefers when you joined?

24 A. There was a briefer in Albany,  
25 [REDACTED], who was preparing to

1 C. Bennett

2 leave the briefing team, and a new briefer  
3 who had the same start date that I did who  
4 was also based out of Albany.

5 Q. Who was the new briefer?

6 A. I don't remember her name right  
7 now.

8 Q. When you started, did you  
9 receive any orientation or training?

10 A. I received an orientation -- we  
11 received a binder of materials and sat in  
12 a small conference room with other new  
13 hires of all levels, went through a quick  
14 PowerPoint, covered I think mostly ethics.  
15 I don't remember exactly the topics.

16 Q. Who led the training that you  
17 attended?

18 A. I don't remember right now.

19 Q. You said you were given a  
20 binder.

21 Do you recall what sort of  
22 materials were in the binder?

23 A. I don't remember, I'm sorry.

24 Q. Did you receive any training  
25 when you joined about sexual harassment?

1 C. Bennett

2 A. No.

3 Q. At any later points, did you  
4 receive any training about sexual  
5 harassment?

6 A. No, not that I recall.

7 Q. Were you aware of anyone else  
8 undergoing any sexual harassment training,  
9 either in person or online?

10 A. I was aware that Stephanie  
11 Benton completed a sexual harassment  
12 training on behalf of the Governor at some  
13 point in 2019.

14 Q. And where was Ms. Benton when  
15 she did that training for the Governor?

16 A. At her desk at 633 on the  
17 thirty-ninth floor.

18 Q. And did you observe her taking  
19 the training?

20 A. No, I was at my desk.

21 Q. Where was your desk in relation  
22 to her desk?

23 A. I sat at a cubicle directly at  
24 the entrance of her office.

25 Q. And so this is after you moved

1 C. Bennett

2 from the thirty-eighth floor to the  
3 thirty-ninth floor?

4 A. Correct.

5 Q. If you did not observe her  
6 taking the training, how do you know she  
7 was taking the sexual harassment training  
8 on behalf of the Governor? What did you  
9 observe or hear?

10 A. She was speaking about  
11 completing it for him. I don't remember  
12 the particular details of her comments,  
13 but it was a very obvious and jarring  
14 moment for me.

15 Q. Was anyone else present other  
16 than you when Ms. Benton was talking about  
17 having completed the training for the  
18 Governor?

19 A. She was speaking to the Governor  
20 at the time.

21 Q. Was he on the phone or in the  
22 office or somewhere else?

23 A. He was at his desk.

24 Q. And if you could describe sort  
25 of the setup, where you sat, she sat, he

1 C. Bennett

2 sat.

3 A. Stephanie Benton and the  
4 Governor can see each other from their  
5 respective desks. Stephanie is facing a  
6 wall. On the other side of the wall is  
7 where my cube is. So I was seated next to  
8 her door just outside her office and was  
9 listening to her exchange behind me with  
10 the Governor.

11 Q. And do you recall anything that  
12 she or the Governor said about her doing  
13 this training?

14 A. I don't want to say any  
15 particular details because the exact  
16 interaction I don't remember.

17 Q. And did the Governor have to  
18 sign any document attesting to having  
19 taken the training?

20 A. Yes.

21 Q. And what do you know about that?

22 A. He signed the certificate that  
23 she presented out at the end of the  
24 training, and I scanned it and sent it to  
25 someone in the office. I don't remember

1 C. Bennett

2 right now who that was. And then was told  
3 to shred the certificate.

4 Q. Did you ever see Ms. Benton  
5 taking sexual harassment training any  
6 other time?

7 A. No.

8 Q. Did you ever see the Governor  
9 taking sexual harassment training?

10 A. No.

11 Q. Prior to June of 2020, did you  
12 ever see any sexual harassment policy that  
13 governed the Chamber?

14 A. No.

15 Q. Were you told, when you started,  
16 that there was any dress code?

17 A. Which position are you referring  
18 to?

19 Q. First when you started as a  
20 briefer, were you told anything about how  
21 you should be dressing for work?

22 A. I was told that there was less  
23 pressure generally because I did not have  
24 face time with the Governor but that, on  
25 days when you expected him in the office,



1 C. Bennett

2 you should dress better and that you could  
3 easily tell which days he happened to be  
4 in the office based on the attire of  
5 people around you.

6 Q. And who told you this when you  
7 started?

8 A. I believe it was [REDACTED]  
9 [REDACTED], but it wasn't such an  
10 outlandish comment for the environment, so  
11 it could have also been someone else or  
12 additional people.

13 Q. And did either [REDACTED] [REDACTED]  
14 or anyone else tell you, other than to  
15 dress better when the Governor was around,  
16 any particular way of dressing?

17 A. When I was hired to be his  
18 executive assistant, I had already an  
19 understanding that I was supposed to wear  
20 heels. I went out and I purchased several  
21 pairs of heels for the job that I was  
22 hired for. And he -- I was told that he  
23 cared deeply about your appearance and  
24 would comment on it if he was not pleased  
25 with it.

1 C. Bennett

2 Q. And by the time you were hired  
3 as an executive assistant, how did you  
4 acquire this understanding that you should  
5 be wearing heels, et cetera?

6 A. I believe my colleagues would  
7 directly discuss that detail in addition  
8 to seeing a colleague who worked on the  
9 thirty-ninth floor come down and take her  
10 heels off or make a comment about the fact  
11 that she has to wear heels today. It was  
12 very much a part of the environment.

13 Q. Were you told there were any  
14 policies about either retaining or  
15 deleting e-mails?

16 A. Yes.

17 Q. What were you told about that?

18 A. That we were meant to delete our  
19 e-mails.

20 Q. Who told you that?

21 A. I believe that was mentioned.

22 So [REDACTED] and I  
23 definitely had a conversation about it. I  
24 remember because I was confused, and she  
25 was at that time guiding me through my new

1 C. Bennett

2 job. But I believe, in addition to that,  
3 it was a part of the orientation.

4 Q. And do you recall being told to  
5 manually delete e-mails or there was a  
6 setting you could use? What were you told  
7 about the process?

8 A. I was told you were meant to set  
9 in Outlook an automatically delete after X  
10 time period.

11 Q. And do you recall what that time  
12 period was?

13 A. No, because I disregarded the  
14 policy.

15 Q. Did anyone ever direct you to  
16 delete specific e-mails, not just after a  
17 certain time period, but delete certain  
18 e-mails on a particular subject?

19 A. Yes.

20 Q. And when did that happen?

21 A. I don't remember particular  
22 instances, but there were moments when  
23 discussions about private matters, like  
24 relating to his campaign or personal  
25 information, it was like we should delete

1 C. Bennett

2 this.

3 Q. And do you recall anyone who  
4 told you to delete specific e-mails or  
5 e-mails about specific subjects?

6 A. I don't recall.

7 Q. And when you were a briefer, did  
8 you communicate directly with the Governor  
9 at all?

10 A. Yes.

11 Q. And what means would you use to  
12 communicate directly with the Governor  
13 when you were a briefer?

14 A. I would PIN him on BlackBerry,  
15 we spoke on the phone, and in person.

16 Q. And did you get a BlackBerry  
17 when you were a briefer?

18 A. Correct, my first day.

19 Q. And you mentioned PINing the  
20 Governor.

21 Did anyone tell you what the  
22 preferred methods were for communicating  
23 with the Governor?

24 A. Yes.

25 Q. What were you told?

1 C. Bennett

2 A. There was a very specific  
3 procedure for communicating to him when  
4 the briefing book arrived at his location.

5 Q. And what was the procedure?

6 A. I don't recall exactly, and I  
7 believe it may have changed over time.

8 Q. Did anyone tell you about the  
9 Governor having a preference forgetting  
10 communications through BlackBerry PINs as  
11 opposed to something else?

12 A. Yes.

13 Q. And who told you about that?

14 A. I don't remember exactly, but it  
15 was very well-known that he was not one to  
16 e-mail and that he only owned a  
17 BlackBerry.

18 Q. Did anyone tell you why the  
19 Governor preferred using BlackBerry PINs  
20 as opposed to other methods of  
21 communication?

22 A. It was fairly understood in the  
23 office that he preferred BlackBerry PIN  
24 because it was encrypted.

25 Q. And did you have any

1 C. Bennett

2 understanding as to whether the BlackBerry  
3 PINs were preserved anywhere, the way  
4 e-mails would be on a server or on a  
5 device?

6 A. No.

7 Q. No, they weren't or no, you  
8 didn't have an understanding?

9 A. I did not have an understanding.  
10 Thank you.

11 Q. When you were a briefer, to whom  
12 did you report?

13 A. Annabel Walsh.

14 Q. What was her role?

15 A. Director of scheduling.

16 Q. And when you were just in the  
17 briefer role, what were your  
18 responsibilities?

19 A. Those first few months of my  
20 original job --

21 Q. As a briefer, yes.

22 A. I would research topics that he  
23 was going to speak about, meet about. I  
24 would research people he was going to meet  
25 with, interact with. We collected

1 C. Bennett

2 biographies with the VIPs attending his  
3 events. We organized briefings from  
4 policy teams, from counsel's office, from  
5 his regional reps as it related to his  
6 day-to-day schedule.

7 Q. And once you gathered all this  
8 information, what did you and the other  
9 briefers do with it?

10 A. It was organized in a very, very  
11 particular way. It had to look a certain  
12 way. It was organized every day in a  
13 particular manner, and we were essentially  
14 the last stop, the last set of eyes, so  
15 our job was to make sure that any  
16 questions were answered in the briefing,  
17 that it made sense, that it was thorough,  
18 clear, easy to read, brief, and that it  
19 contained his schedule.

20 Q. And was there a time of day by  
21 which the book for the next day had to be  
22 done?

23 A. That was -- that changed  
24 throughout my job. We would have really  
25 late books, and if that was an issue, we

1 C. Bennett

2 would get -- we would be told that was an  
3 issue, now we need to have it by 6:00 p.m.  
4 every day, as an example.

5 But no, technically there was no  
6 deadline.

7 Q. And during the first few months  
8 when you were just in the role of briefer,  
9 did you have any interactions with the  
10 Governor?

11 A. I attended his voting reform  
12 press conference on January 24, 2019 was  
13 my first day, and they were filling seats  
14 in the press conference.

15 And then that same spring I was  
16 sitting at my cubicle and he walked by and  
17 waved, so I waved. He was on his way from  
18 the press conference, the presser room,  
19 and was getting up the stairs to  
20 thirty-nine.

21 Q. So the presser room was on  
22 thirty-eight where you had your cubicle?

23 A. Correct.

24 Q. And during this first few months  
25 when you were just a briefer, any other



1 C. Bennett

2 interactions with the Governor?

3 A. No.

4 Q. And in those first few months,  
5 did you ever do any work up in Albany?

6 A. Yes.

7 Q. How often did you go to Albany  
8 just in the time you were in the briefer  
9 role?

10 A. Less than ten.

11 Q. And were there specific events  
12 or occasions that you went up for?

13 A. I went to Albany to help staff a  
14 party at the Executive Mansion. I would  
15 visit Albany to cover if there was no  
16 Albany briefer available for a period of  
17 time.

18 Q. And when you were covering when  
19 there was not an Albany briefer available,  
20 would you do that work at the Capitol  
21 Building?

22 A. Correct.

23 Q. And you mentioned staffing a  
24 party at the mansion.

25 During this period of time, did

1 C. Bennett

2 you go to the mansion on any other  
3 occasions?

4 A. Early on in my tenure, no.

5 Q. And when you were just a  
6 briefer, did you work weekends?

7 A. Yes.

8 Q. And how frequently did you work  
9 weekends?

10 A. Most weekends.

11 Q. And on the weekends, what sort  
12 of work were you doing on the weekends?  
13 Was it also putting together a briefing  
14 book, or was it something else?

15 A. Correct, still briefing book  
16 work.

17 Q. And did there ever come a time  
18 when you began to spend more time in  
19 Albany?

20 A. There was a period of time in  
21 which I was in Albany more. It was a  
22 result of issues with the briefing team  
23 not having enough staff and my work  
24 directly with the Governor after I was  
25 hired as his executive assistant.

1 C. Bennett

2 Q. And when did you start spending  
3 more time in Albany?

4 A. I would say July.

5 Q. Of 2019?

6 A. Of 2019.

7 Q. And when was there ever a period  
8 of time when you were staying for an  
9 extended period of time in Albany?

10 A. In 2019?

11 Q. At any point later.

12 A. For COVID I stayed in Albany  
13 March 23, 2020 and I moved out of the  
14 hotel room in July, 2020.

15 Q. What hotel were you staying in?

16 A. The [REDACTED]

17 Q. And who asked you to essentially  
18 move up to Albany to this hotel during  
19 that period?

20 A. Jill Desrosiers.

21 Q. And what was your reaction when  
22 you were asked to move up to Albany during  
23 the COVID period?

24 A. I was not surprised. I was very  
25 scared of COVID, but I also expected that

1 C. Bennett

2 they would want me there.

3 Q. And was the Governor staying in  
4 Albany during the COVID period?

5 A. Correct.

6 Q. Did you have -- did the  
7 frequency of your interactions with the  
8 Governor change during COVID?

9 A. Yes, I saw less of him.

10 Q. Did you ever complain to anyone  
11 that you weren't getting enough face time  
12 with the Governor?

13 A. Very possible, but I don't  
14 remember particularly, no.

15 Q. Do you recall any period of time  
16 where you felt you weren't getting enough  
17 face time with the Governor?

18 A. It's possible that I was  
19 frustrated, but I don't remember  
20 particularly.

21 Q. Was it during the time of COVID  
22 where you were seeing less of him, or was  
23 it some other period of time?

24 A. It was probably during COVID.

25 Q. And we've heard a couple of

1 C. Bennett

2 times to a period of time when your  
3 responsibilities changed.

4 When did that happen? When was  
5 the first change in your responsibilities?

6 A. The first change in my  
7 responsibilities took place on May 9,  
8 2019. That's when I met the Governor and  
9 was, as I see it, the first day as his  
10 executive assistant.

11 Q. What happened in -- where did  
12 you meet the Governor in May?

13 A. I met him in his office at 633.

14 Q. And how did it come about that  
15 you met him in his office on that day?

16 A. I was asked to come upstairs to  
17 see Annabel Walsh, my boss, and she had  
18 the day prior told me we -- I don't  
19 remember exactly what she had said the day  
20 before, but said, you know, let's get a  
21 meeting with him to see if this position  
22 as executive assistant could work.

23 So I get a call on May 9. I go  
24 to Annabel, and she asks me if I'm ready  
25 to meet with him.

1 C. Bennett

2 Q. And prior to the conversation  
3 where Annabel said we need to get a  
4 meeting to see if this position would  
5 work, had you talked with anyone before  
6 that about the possibility of becoming  
7 executive assistant to the Governor?

8 A. No.

9 Q. And did she tell you why you  
10 were being considered for the position of  
11 executive assistant to the Governor?

12 A. Not that I can remember.

13 Q. And at the time you met with the  
14 Governor, who was his executive assistant  
15 or assistants in the New York City office?

16 A. Staffer #5.

17 Q. Anyone else in New York?

18 A. No.

19 Q. And so you got the call from  
20 Annabel saying you had a meeting with the  
21 Governor?

22 A. I received a call that Annabel  
23 wanted to speak with me, and then when I  
24 arrived in her office, she asked if I was  
25 ready to meet with him.

1 C. Bennett

2 Q. Where was Annabel Walsh's  
3 office?

4 A. Connected to and directly next  
5 to Stephanie Benton's.

6 Q. So did you tell Annabel Walsh  
7 that you were ready to meet with the  
8 Governor?

9 A. Yes.

10 Q. And did you then go meet with  
11 the Governor?

12 A. Yes.

13 Q. Was that in his office?

14 A. Yes.

15 Q. And who was present?

16 A. Annabel Walsh and the Governor.

17 Q. How long did this meeting last?

18 A. I cannot recall specifically,  
19 but it was -- no, I don't want to guess,  
20 but it was brief.

21 Q. And do you recall anything of  
22 what you said, the Governor said, or Ms.  
23 Walsh said?

24 A. Annabel introduced me briefly,  
25 and the rest of the conversation was

1 C. Bennett

2 mostly between the Governor and myself.  
3 He asked me basic questions about what I  
4 had done previously for work, where I was  
5 from, how long I had been with the  
6 administration, and in what capacity. It  
7 was a very introductory meeting.

8 Q. And were you offered the  
9 position during that meeting?

10 A. Nothing explicit.

11 Q. What was the next thing that  
12 happened in connection with you becoming  
13 an executive assistant to the Governor?

14 A. After that meeting, I started  
15 sitting on thirty-nine, the thirty-ninth  
16 floor.

17 Q. And who asked or directed you to  
18 start sitting on the thirty-ninth floor?

19 A. I do not remember.

20 Q. And how long after the meeting  
21 with the Governor did you start sitting on  
22 the thirty-ninth floor?

23 A. I don't remember. It was maybe  
24 that day or that week.

25 Q. And when you went up to the



1 C. Bennett

2 thirty-ninth floor, is that the desk that  
3 you were describing that was near outside  
4 of Ms. Benton's office?

5 A. Correct.

6 Q. And prior to becoming the  
7 executive assistant to the Governor, did  
8 you speak to anyone, Staffer #5 or  
9 anyone else about what this role would  
10 entail or whether you should take on this  
11 role?

12 A. Staffers were, when they found  
13 out that I was most likely going to take  
14 the job, would share their opinion. It  
15 was in the office considered a pretty big  
16 deal.

17 And at that time, when I was  
18 sitting at that desk, I was still sharing  
19 it with Staffer #5 as we call him, Staffer #5  
20 but Staffer #5 is his nickname, and Staffer #5  
21 was very clear with me about the  
22 expectations of the job, his experience in  
23 the role, and advice for me.

24 Q. How long did you and Staffer #5 share  
25 the desk?

1 C. Bennett

2 A. He left the Executive Chamber in  
3 May, so it was a brief period of time, but  
4 I don't know exactly the time.

5 Q. And what sort of information or  
6 advice did Staffer #5 share with you?

7 A. He was desperate to get out of  
8 his current role, and had been waiting to  
9 receive a new job for an extended period  
10 of time. He explained that it was one of  
11 the harder jobs in the office. He  
12 described the Governor as someone who is  
13 very charismatic, but to never get too  
14 comfortable with him because he tests  
15 people, and not to -- to always have your  
16 guard up even if things seemed friendly.  
17 He described being yelled at, very tough  
18 hours, difficult work environment, toxic  
19 work dynamics, issues negotiating his  
20 salary. He explained to me that my job  
21 was to keep Stephanie Benton happy. And  
22 we at times discussed the power dynamics  
23 in the office between the Governor and  
24 senior staff and how to navigate them.

25 Q. Any other topics you recall that

1 C. Bennett

2 Staffer #5 shared with you while you were sharing  
3 the desk?

4 A. We spoke about how to dress,  
5 certain things he liked or didn't like,  
6 even down to how he liked his coffee,  
7 which he explained to me he spent a  
8 significant amount of money buying for the  
9 Governor, his own personal money, and that  
10 I would be doing the same and that I  
11 should not expect to be reimbursed.

12 He showed me how to complete  
13 certain tasks: If they ask you to do X,  
14 this is how you do it, and you better do  
15 it this way.

16 Q. Anything else you recall on any  
17 other topics?

18 A. A lot of pep talk, like he  
19 really was a friend at that time and I was  
20 extremely nervous. I was confident but  
21 nervous and he really wanted someone to  
22 take his job.

23 Q. Did you have the understanding  
24 that he couldn't leave unless there was  
25 somebody in place to take his job?

1 C. Bennett

2 A. Yes.

3 Q. And what did he tell you about  
4 his difficulty leaving the position?

5 A. He explained that they had hired  
6 a staffer to replace him and, upon hiring,  
7 the Governor -- upon hiring her, something  
8 did not work out, and so they just kept  
9 him in his position, and then he continued  
10 to wait.

11 He explained to me that he had  
12 to fight tooth and nail to receive his  
13 raises, I don't know plural, I don't know  
14 if it's singular; he explained that. The  
15 tactic that worked best for him was his I  
16 guess last resort, which was to threaten  
17 to hand in his two-week notice by the end  
18 of the day if he didn't receive  
19 confirmation that he was going to get his  
20 raise, and that was the way in which he  
21 got his raise.

22 Q. Did he tell you who he had these  
23 discussions with about his raise?

24 A. I'm not sure.

25 Q. You said he talked about the

1 C. Bennett

2 Governor testing people.

3 Did he give you any examples of  
4 how the Governor did that?

5 A. I don't remember right now any  
6 particular examples.

7 Q. You said he described being  
8 yelled at.

9 Did he tell you how often he had  
10 been yelled at by the Governor?

11 A. My understanding was that their  
12 relationship was not in a great place, so  
13 it was -- I don't know how frequent, but  
14 it wasn't a healthy communication between  
15 the two of them.

16 Q. Did Staffer #5 describe being yelled at  
17 by anyone else on staff?

18 A. Not specifically.

19 Q. You said that the two of you  
20 discussed the power dynamics between the  
21 Governor and some of the senior staff.

22 What did the two of you discuss  
23 about that?

24 A. An example would be his  
25 relationship to Stephanie, which I think a

1 C. Bennett

2 lot of the office -- I don't think people  
3 understood exactly how much she did with  
4 and for him, and that when Stephanie  
5 speaks, it may as well be the Governor  
6 speaking.

7 Later on in my position, after  
8 he had left, I would text him I think for  
9 advice. My relationship with my boss,  
10 Annabel, largely started falling apart and  
11 he -- I trusted his read on the situation  
12 in a way that I felt very isolated and not  
13 a lot of people can understand sitting in  
14 the seat that we sat in, so kind of  
15 looking to him as, you know, a mentor and  
16 a friend.

17 Q. And I noticed that there's  
18 tissues over there, so feel free to get up  
19 and grab one if you need one at any point,  
20 or if you need to take a break.

21 You said you think a lot of  
22 people in the office realized how much Ms.  
23 Benton did with and for the Governor.

24 What did you mean by that?

25 A. There was one -- just as an

1 C. Bennett

2 example, I didn't even know who she was.

3 I'm not sure if I had laid my eyes on her

4 much in the first few months. She sent an

5 e-mail, it was either an e-mail or a PIN

6 to me saying, "don't drop," meaning

7 whatever the briefing was, don't drop

8 that. And I asked [REDACTED] at the time we

9 were told to drop this and she just said

10 that's the final word, like no questions

11 asked was how she explained it, and that

12 really confused me, because she is -- I

13 don't know if I'm explaining this well.

14 If you're just a junior staffer, you might

15 not, you know, interact with her at all

16 and she really is his right hand and

17 people can mistake her as an assistant,

18 and [REDACTED] Staffer #5 was very clear that she was

19 absolutely not an assistant, and not to

20 underestimate or sidestep or question or

21 anything of that nature with Stephanie.

22 Q. What did [REDACTED] Staffer #5 tell you about her

23 role or -- other than to say not to

24 underestimate, did he give you any other

25 description of what her role was?

1 C. Bennett

2 A. I don't remember right now, but  
3 if something pops up.

4 Q. Over time, as you began working  
5 more closely with Ms. Benton, what did you  
6 determine about a her role was with  
7 respect to the Governor?

8 A. She managed his life. She would  
9 speak to his siblings, coordinate with  
10 staff, she would tell him when he forgot  
11 to do something, would track his  
12 movements. If she was not in the office  
13 and you were covering for her, the  
14 expectation was you were writing an actual  
15 list of all the things that he did and you  
16 would provide her that, so she knew  
17 exactly what he was doing, where he was,  
18 and all the work that he had.

19 I don't know if that's a solid  
20 explanation, but I really -- the most  
21 right hand I've ever -- I could describe.

22 Q. And you said that you were later  
23 texting Staffer #5 when you were having issues in  
24 your relationship with Ms. Walsh.

25 When did that breakdown start to



1 C. Bennett

2 happen?

3 A. That breakdown between Annabel  
4 and me started over the summer of 2019, I  
5 would say around August, and continued to  
6 decline.

7 Q. We'll come back to that, but  
8 what advice, if any, did Staffer #5 give you about  
9 dealing with Ms. Walsh?

10 A. I don't remember the  
11 particulars, but the general message I  
12 remember receiving was that she feels  
13 threatened by me and that I need to -- or  
14 not even that I need to, I think the  
15 message I received, whether it was  
16 something he said explicitly or not I  
17 don't remember, but I really tried to let  
18 things go if I could and that if she  
19 wanted to be mean, then that was her  
20 prerogative.

21 Q. In discussing power dynamics  
22 with Staffer #5 did the two of you discuss  
23 Melissa DeRosa?

24 A. I'm sure question did, because  
25 it would be difficult to talk about senior

1 C. Bennett

2 staff without talking about Melissa. But  
3 again, I don't remember particulars.

4 Q. You said one of the topics you  
5 discussed with <sup>Staffer #5</sup> [REDACTED] early on was how to  
6 dress.

7 What did he say to you with  
8 respect to that?

9 A. He told me that the Governor  
10 would look him up and down, ask him why he  
11 was wearing the shoes he was wearing or  
12 would make a comment if he wasn't happy.  
13 I'm not sure if we discussed heels and  
14 dresses, it's possible, but I don't  
15 remember.

16 Q. You said there was also other  
17 junior staffers you spoke with when you  
18 were assuming the role.

19 Who else did you speak with  
20 about taking on the executive assistant  
21 role?

22 A. [REDACTED], [REDACTED],  
23 [REDACTED] -- that's definitely not  
24 her last name -- [REDACTED], [REDACTED]  
25 [REDACTED], [REDACTED]. I'm sure others.

1 C. Bennett

2 Q. What did [REDACTED] tell you  
3 or say to you when she found out that you  
4 were assuming the role?

5 A. She -- I don't remember what  
6 exactly she said, but she was angry, and  
7 it did cause, from the moment I found out  
8 I would be in this position to her  
9 departure later that summer, to May to  
10 July, it -- she was noticeably frustrated  
11 with me, and I heard from other staffers  
12 that she was talking about it behind my  
13 back.

14 Q. And did she tell you what she  
15 was saying?

16 A. Not specifically, but she seemed  
17 overwhelmed with the briefing book, and we  
18 were the only two briefers, and I for a  
19 bit did really step away. I was still  
20 helping but not nearly what a full-time  
21 briefer would be doing, because I was  
22 training for a second job. But I also  
23 understood that she was overworked, she  
24 was frustrated, and I think hurt that -- I  
25 don't want to guess how she was feeling,

1 C. Bennett

2 but she had not yet met the Governor and  
3 she was almost two years into her job.

4 Q. What did [REDACTED] [REDACTED] say to you  
5 about the position?

6 A. He was giving me advice on being  
7 a body person. He had served not the  
8 Governor but a different politician in a  
9 similar capacity, obviously every job is  
10 different at that level, but I think he  
11 understood more than some of the others  
12 what my -- what this change meant for me.

13 Q. Do you recall any of the advice  
14 that he gave you?

15 A. Not specifically.

16 Q. Do you recall in general terms  
17 what he advised you?

18 A. I don't remember specifically.  
19 He shared -- I don't remember, but shared  
20 stories and seemed proud of me and excited  
21 for me and he was kind of like you can do  
22 this.

23 Q. And [REDACTED] [REDACTED] or whatever  
24 her last name is, what did she say to you  
25 about the role?

1 C. Bennett

2 A. I also don't recall, but I do  
3 think that I -- she received a lot of the  
4 -- so [REDACTED] [REDACTED], and [REDACTED] all  
5 shared an office, so I think that they  
6 were closest to [REDACTED] when she was dealing  
7 with my transition, so I remember asking  
8 her at one point to explain to me what the  
9 issues with [REDACTED] were. I don't remember  
10 what she said, but her response made it  
11 clear to me that [REDACTED] was angry.

12 Q. And what did [REDACTED] [REDACTED] say to  
13 you?

14 A. I remember on one of my first  
15 days, I believe [REDACTED] [REDACTED], maybe someone  
16 else, showed up at my cubicle and they  
17 looked like they had death all over their  
18 face. I was anxious, but their anxiety  
19 was like terrifying for me.

20 I don't remember specifically  
21 what she had said, but [REDACTED] [REDACTED], and  
22 [REDACTED] office it was a meeting place  
23 for a lot of junior staffers, and she  
24 spent a lot of time there, so I definitely  
25 -- and she was a very -- she said been

1 C. Bennett

2 there for years, so I absolutely know we  
3 talked about it, and I just remember  
4 receiving that visit on one of my first  
5 days when I was at my desk and just  
6 thinking like what is everyone -- it looks  
7 like I died or something. I don't know.  
8 And I remember texting [Staffer #5] about it and  
9 being like what's wrong.

10 Q. Did [REDACTED] [REDACTED] ever tell you  
11 why she seemed anxious when you assumed  
12 that role?

13 A. No, I just think that no one  
14 wanted it and it was like a death  
15 sentence.

16 Q. Who told you that nobody wanted  
17 it?

18 A. I don't think anyone, it was  
19 more the issue of seeing the fact that  
20 they couldn't seem to fill the position.

21 Q. And when you say it was a death  
22 sentence, what did you mean by that?

23 A. I would say that's my own term,  
24 so I'm not attributing that to anyone.  
25 That you in that role will receive a lot

1 C. Bennett

2 of some of the harder dynamics of the  
3 office.

4 Something that I remember now  
5 about my conversations with Staffer #5 he  
6 explained that there were several women  
7 before him who had held the role only for  
8 a brief period of months, like back to  
9 back to back, to the point where the  
10 troopers who the EA would interact with a  
11 lot, a lot of coordinating movements and  
12 information sharing, the troopers couldn't  
13 keep track of the names of the women  
14 changing jobs, so there was a joke -- I  
15 don't know who -- about just as an  
16 example, I don't know if it was [REDACTED], but  
17 it was like [REDACTED] One, [REDACTED] Two, [REDACTED]  
18 Three, they started numbering with the  
19 same name the replacements, because there  
20 was such turnover.

21 There was something else that  
22 popped up, but I'm losing it. It might  
23 come back to me.

24 Q. You said you also spoke to [REDACTED]  
25 [REDACTED] ?

1 C. Bennett

2 A. Yes.

3 Q. And what did [REDACTED] [REDACTED]  
4 say to you?

5 A. She was newer. I don't remember  
6 when she started, at some point over the  
7 summer of 2019, and one of her previous  
8 jobs was working for an executive and, in  
9 that role, she, you know, had things  
10 thrown at her, stories like that. And so  
11 similar to [REDACTED] [REDACTED] with his stories  
12 about being a body person, I think we were  
13 kind of sharing war stories.

14 Q. And did you have any war stories  
15 to tell at that point about the Governor  
16 when she was sharing her war stories about  
17 being an executive assistant for somebody  
18 else?

19 A. I don't -- I'm not sure.

20 Q. What did [REDACTED] [REDACTED] tell you?

21 A. So I remember we were -- for  
22 context, if the Governor didn't like you,  
23 if you messed something up, that could  
24 easily be the very last moment of your  
25 job, and I remember he was leaving to work



1 C. Bennett

2 on a campaign, not related, he was just  
3 leaving the administration, he was very  
4 well-respected, very close to the  
5 Governor, and I remember just saying like  
6 I feel like I'm just going to mess up and  
7 lose my job. It was late, we were at a  
8 bar, and I was kind of like -- people  
9 congratulating me, it was kind of the  
10 talk, the chatter, so this list is more  
11 just like the chatter of my experience  
12 sharing it with other junior staffers.  
13 And at the time when I said that [REDACTED], he  
14 just was like isn't that like any other  
15 job. And I was like yeah, that's a good  
16 point. When you put it like that, yeah.

17 And then he came back for COVID,  
18 we kind of rehired him for COVID, and we  
19 had only overlapped briefly in 2019, so I  
20 was like it's great to see you. We were  
21 talking, he was back in the office, and I  
22 relayed this story. I was like, I don't  
23 know if you remember last year at the very  
24 beginning of my job I made this comment of  
25 I think I'm going to mess up and lose my

1 C. Bennett

2 job and you were like, well, isn't that  
3 any job. And he was like, I'm sorry I  
4 said that.

5 That was -- it was just kind of  
6 funny because in that moment acknowledging  
7 like no, it's not just any job, and so  
8 belittle that anxiety is incorrect  
9 because, in fact, I could give him the  
10 wrong pen and he could decide that he  
11 didn't like me anymore.

12 Q. Had you heard stories about  
13 someone that did something really trivial  
14 that put them out of their job?

15 A. No, but I understood that he  
16 would have kind of an introductory meeting  
17 with a potential replacement for Staffer #5 and he  
18 would decide kind of on the spot I do or  
19 do not want this person, which is I think  
20 how Staffer #5 got stuck in that position for so  
21 long.

22 Q. And did any junior staffers tell  
23 you that they think the Governor liked you  
24 because you were pretty?

25 A. I received that, but I don't

1 C. Bennett

2 particularly know who from, but it really  
3 bothered me. I only remember it because I  
4 was offended, and I think at one point it  
5 may have come from [REDACTED] and I felt like  
6 some of her anger was also -- you know,  
7 she had been in this job for two years,  
8 blood, sweat, and tears, hadn't even met  
9 him, and I get hired and within a few  
10 months I'm moving floors, have multiple  
11 job titles, I'm running the team that she  
12 was just on for two years. And within  
13 that, I don't know if she said it or if  
14 someone else said it, but it was  
15 definitely a theme that I took offense to.

16 Q. You mentioned that you  
17 interacted with the troopers a lot,  
18 coordinating the Governor's whereabouts  
19 and such.

20 Did any troopers ever tell you  
21 about any issues they had with the  
22 Governor?

23 A. Not particular issues. I think  
24 they were wondering to see how long I  
25 would last in the position. I don't

1 C. Bennett

2 remember explicitly, but there may have --  
3 and I could be wrong, but I am under the  
4 impression that there was a bet to see how  
5 long I would last.

6 Q. Do you recall what the range was  
7 for the bets?

8 A. I exceeded it. That's what I  
9 heard.

10 Q. When you became executive  
11 assistant, did you continue to work as a  
12 briefer? I know you said you stepped away  
13 from it while you were learning the ropes,  
14 but did you continue working on the  
15 briefing team in any capacity?

16 A. Yes.

17 Q. And what did you do on the  
18 briefing team after you assumed the  
19 executive assistant responsibilities?

20 A. Can you repeat that question?

21 Q. Sure.

22 Once you took on some  
23 responsibilities as executive assistant,  
24 what did you continue to do with respect  
25 to the briefing role?

1 C. Bennett

2 A. I would help [REDACTED]. Usually she  
3 would take the lead and I would kind of  
4 take orders from her. It largely depended  
5 on the day. Days where I was staffing the  
6 Governor, usually less responsive and less  
7 available.

8 Q. And did there come a time where  
9 your role on the briefing team changed at  
10 all?

11 A. Yes.

12 Q. When was that?

13 A. That was when [REDACTED] left.

14 Q. And you said that was around  
15 July of 2019?

16 A. Correct.

17 Q. And after she left, how did your  
18 role change?

19 A. I became senior briefer.

20 Q. And was someone -- was anyone  
21 else hired on the New York team to be a  
22 briefer at that time?

23 A. Yes.

24 Q. And who was hired then?

25 A. [REDACTED] [REDACTED].

1 C. Bennett

2 Q. So after May of 2019, describe  
3 sort of what your day-to-day roles were.

4 A. I was serving as an executive  
5 assistant and then, in the time and  
6 capacity I had left over, I was helping  
7 [REDACTED] with the briefing book and she was  
8 trying her best to prepare me for her  
9 departure.

10 Q. And during the summer of 2019,  
11 did you do any traveling with the  
12 Governor?

13 A. Yes.

14 Q. How often did you travel with  
15 the Governor during the summer of 2019?

16 A. A handful of times. My first  
17 travel with him was the day of the Pride  
18 parade in 2019, and that went really well,  
19 according to Stephanie after the fact, and  
20 so I traveled with him several more times  
21 through the summer.

22 Q. And I meant to ask, so after May  
23 of 2019, did you continue to report to  
24 Annabel Walsh for the briefing work that  
25 you did?

1 C. Bennett

2 A. Yes.

3 Q. And who did you report to for  
4 the executive assistant role?

5 A. Stephanie Benton and Annabel in  
6 some capacity.

7 Q. And during the trips you took  
8 with the Governor in the summer of 2019,  
9 did anything inappropriate happen?

10 A. No.

11 Q. And did there come a time where  
12 you stopped doing the traveling with the  
13 Governor?

14 A. In August of 2019.

15 Q. And what led to you no longer  
16 traveling with the Governor in August of  
17 2019?

18 A. I was overworked and said as  
19 much to Jill Desrosiers and Annabel Walsh,  
20 and I explained, prior to the end of my  
21 travel, that I was concerned something was  
22 going to fall through the cracks. I said  
23 I was concerned that I was juggling some  
24 pretty important responsibilities and I  
25 wanted to raise my concern with them

1 C. Bennett

2 before something happened that it's very  
3 possible something may happen in which I  
4 am simply at capacity and it doesn't go  
5 well for that reason, and that is largely  
6 what happened. And I got yelled at on the  
7 phone by Stephanie Benton, Annabel Walsh,  
8 and Jill Desrosiers.

9 Following that phone call, I  
10 called Annabel and just, you know, I took  
11 responsibility for the issue at hand, but  
12 explained that there's simply no way I can  
13 be an at-my-desk executive assistant, be a  
14 senior briefer to a very new team of two  
15 right out of college staffers, and also  
16 travel with the Governor, and that I was  
17 going to stop traveling.

18 Q. You mentioned two just out of  
19 college briefers. You mentioned [REDACTED].

20 Who was the another new briefer?

21 A. [REDACTED] [REDACTED] was based in  
22 Albany.

23 Q. And do you recall the incident  
24 was that had you getting yelled at by  
25 Stephanie Benton, Annabel Walsh, and Jill



1 C. Bennett

2 Desrosiers?

3 A. I at that time had worked out of  
4 the Executive Mansion, and there was a  
5 weekend when the capital was simply shut  
6 down, and I gave [REDACTED] permission to go  
7 to the Executive Mansion to print the book  
8 materials, because the capital was shut  
9 down and I think I misread my -- I felt  
10 comfortable working out of the Executive  
11 Mansion, and I gave her permission to go  
12 there on the weekend to use the back  
13 office, and he saw her and mentioned it to  
14 Stephanie, who then asked why there was a  
15 staffer at the Executive Mansion, and I  
16 took responsibility and I said the entire  
17 office was closed, so I told her to use  
18 the printer at the mansion. And that was  
19 my mistake.

20 Q. You say he saw her.

21 Was that the Governor who saw  
22 her at the mansion?

23 A. Correct.

24 Q. And you said you told Annabel  
25 Walsh that you weren't going to travel

1 C. Bennett

2 with the Governor anymore.

3 How did she respond?

4 A. She seemed to accept it.

5 Q. Was she at all upset when you  
6 told her?

7 A. She asked me leading questions  
8 and wanted to see if I would complain  
9 about being yelled at on the phone by  
10 three senior staff and asked me if I felt  
11 attacked or if I felt sabotaged or very --  
12 felt unprofessional and inappropriate  
13 questions and I said, no, I take  
14 responsibility for my mistake, but like I  
15 said, I'm working three jobs, those are  
16 three jobs, and I'm not going to do that;  
17 I told you I couldn't. I told Jill I  
18 wouldn't that this was going to be an  
19 issue. It's an issue, so I'm not going to  
20 travel now.

21 Q. I'm going to ask you to turn to  
22 the binder in front of you and look at the  
23 first tab. And let me just explain that  
24 we got some texts from Staffer #5 that had some  
25 technical issue, so they had to be put

1 C. Bennett

2 into a spreadsheet so we could see when  
3 the dates they were actually sent. Let me  
4 get my glasses on, because this type is  
5 teeny.

6 And here these are texts between  
7 you and Staffer #5 August 9, 2019, and you wrote,  
8 "also, just got Annabel on the phone and  
9 put my foot down. On Wednesday, told her  
10 they were being ridiculous and I would  
11 stop doing the other jobs if they didn't  
12 take a step back and realize. Told her  
13 I'm not going to Alb anymore and not  
14 flying with him anymore."

15 Is that when you had that  
16 conversation with Ms. Walsh and you said  
17 you weren't going to travel anymore?

18 A. Yes.

19 Q. And little further down, it  
20 looks like Staffer #5 asked you, "how did that  
21 go," and you wrote, in all caps, "pissed."

22 Do you recall what you're  
23 referring to there?

24 A. I was very angry.

25 Q. So you were referring to you

1 C. Bennett

2 were angry, not Ms. Walsh was angry?

3 A. I was angry.

4 Q. You can put that aside.

5 When you first started working  
6 for the administration, what was your  
7 salary?

8 A. [REDACTED], I believe.

9 Q. And --

10 A. Around there.

11 Sorry.

12 Q. That's okay.

13 Did you have any sense what  
14 other junior staffers got paid?

15 A. I know [REDACTED] [REDACTED] had a  
16 similar salary to my own.

17 Q. Did there come a time where you  
18 talked to anyone about getting a raise?

19 A. Yes.

20 Q. And when was that?

21 A. I was starting conversations  
22 probably September of 2019 through  
23 October, 2019 with the expectation of  
24 continuing those conversations in 2020.

25 Q. Who did you start having the

1 C. Bennett

2 conversations with?

3 A. Staffer #5. I know I spoke  
4 with [REDACTED] [REDACTED]. I spoke with -- I think  
5 those were the two main people I spoke  
6 with, but I was very vocally upset about  
7 my salary at that time.

8 Q. You described before your  
9 conversations with Staffer #5.

10 What did you and [REDACTED] discuss  
11 about your salary, or about getting a  
12 raise?

13 A. How to go about asking for a  
14 raise and what I saw as a painful process  
15 to secure that raise.

16 Q. And what is the painful process  
17 that you saw from getting a raise?

18 A. I -- and as you can see in the  
19 conversation we just looked at, I was  
20 feeling very taken advantage of. I  
21 started working for the administration and  
22 then I was working two completely separate  
23 roles, two full-time jobs held by two  
24 separate people, and I still had an  
25 entry-level salary, and I was commuting

1 C. Bennett

2 three hours a day to get into the city  
3 because I couldn't afford to move, even  
4 though I held significant responsibility  
5 and multiple titles. And I thought it was  
6 -- I saw it as a huge problem.

7 Q. Did [REDACTED] [REDACTED] give you any  
8 advice as to how to go about asking for a  
9 raise?

10 A. I don't remember.

11 Q. When, if ever, did you first  
12 discuss getting a raise with anyone that  
13 had the leeway to give you a raise?

14 A. I spoke with Annabel Walsh. I  
15 believe that conversation started in  
16 September is my best guess.

17 Q. And what did you say to Ms.  
18 Walsh and what did she say to you?

19 A. I explained that, with the hours  
20 I was working, if I were paid hourly,  
21 broke it down by the hour, I would be paid  
22 less than minimum wage for the State of  
23 New York. I have multiple  
24 responsibilities, one of which is leading  
25 a team. I can't afford to live in the

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2 city in which I work.

3 And I was almost emotional to  
4 the point of being so at capacity, so  
5 exhausted, and under so much stress and  
6 pressure, and was really -- explained to  
7 her that I saw -- I thought it would be  
8 more appropriate to fully renegotiate my  
9 sale, because I was in two positions that  
10 I did not have when I first started with  
11 the administration, even though my  
12 paycheck had not changed.

13 Q. And what was her response?

14 A. I remember her joking that she  
15 also couldn't afford to live in this very  
16 expensive city, which was very painful for  
17 me at the time. I didn't think it was  
18 funny. I actually saw it as extremely  
19 unprofessional and diminishing of actually  
20 very valid points that I had. She also  
21 suggested that I travel more. I believe  
22 in the same conversation I was trying to  
23 raise the issue of expanding the briefing  
24 team, because we only had one Albany  
25 staffer, and that I simply was not going

1 C. Bennett

2 to travel to Albany to cover us because we  
3 were understaffed, because I was running  
4 the team and also had to be at my desk in  
5 New York City when he -- when the Governor  
6 was in town, and she disagreed with that  
7 as well.

8 I think I asked for a specific  
9 number. She didn't seem to take that  
10 seriously but said that we could work out  
11 something. It was, as I remember it, I  
12 was pretty emotional and I was very  
13 frustrated and I didn't -- as productive  
14 as I was because the series of  
15 conversations we engaged in did result in  
16 a raise, I was extremely disheartened by  
17 her professionalism and her dismissive  
18 attitude.

19 Q. And in fall of 2019, how many  
20 conversations did you have with Ms. Walsh  
21 about getting a raise?

22 A. At least two.

23 Q. And you said you ultimately  
24 worked out a raise; is that correct?

25 A. Correct.



1 C. Bennett

2 Q. When did you get the raise?

3 A. October.

4 Q. And what was the raise to?

5 A. Fifty-five.

6 Q. If you could turn to tab two.

7 It's another text exchange that is in this  
8 format because of the technical issues  
9 between you and Staffer #5. And this  
10 exchange is on September 23, 2019 and you  
11 wrote in part, "I asked Annabel if we  
12 could talk about a raise and she gave me a  
13 fine/acceptable but also typical Annabel  
14 shitty response." You say "respond" and  
15 then "response."

16 Do you recall what the "Annabel  
17 shitty response" was you were referring  
18 to?

19 A. I think the fine/acceptable is  
20 me stating that yes, I would get a raise,  
21 and in that capacity it was a  
22 fine/acceptable meeting, but with that  
23 came I think some of the same behavior I  
24 stated in terms of being, in my mind,  
25 unprofessional and dismissive.

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2 Q. And this is dated September 23,  
3 2019.

4 Was that the date of your first  
5 conversation with Ms. Walsh, or your  
6 second one?

7 A. This was the first conversation.

8 Q. And further down Staffer #5 wrote, "I  
9 got my first raise after three years by  
10 threatening to quit on the spot."

11 That's the conversation or  
12 exchange you referred to earlier? You  
13 have to say yes or no out loud.

14 A. Sorry, yes.

15 Q. And if you look on the flip side  
16 of this page, it was in that first  
17 conversation with Ms. Walsh where she told  
18 you that she couldn't afford to live in  
19 the city?

20 A. Yes.

21 Q. Did she, in fact, live in the  
22 city?

23 A. Yes.

24 Q. And what was your reaction when  
25 she said she couldn't afford to live in

1 C. Bennett

2 the city?

3 A. I don't believe I gave it any  
4 response in the moment.

5 Q. You talked earlier about your  
6 relationship with Ms. Walsh having issues.

7 In the fall of 2019, do you  
8 recall what, if any, issues you were  
9 having with Ms. Walsh?

10 A. There seemed to be issues. I  
11 interpret it largely as being successful  
12 in my positions, my growing relationship  
13 with the Governor, and my vocal  
14 frustration when necessary.

15 Q. Do you recall any particular  
16 events or issues where you and Ms. Walsh  
17 had a disagreement?

18 A. Yes.

19 Q. What do you recall?

20 A. In December of 2019, I raised  
21 the issue of again we need more staff on  
22 this team. And she in turn asked me like  
23 what I did in the office, and I explained  
24 that I had two jobs, there's one person in  
25 Albany, we're all burnt out: [REDACTED] is

1 C. Bennett

2 burnt out, I'm burnt out, [REDACTED] burnt  
3 out. I tried to raise the issue of having  
4 not enough staff, and also being split  
5 between two jobs. And she asked me what I  
6 did every day, explained that perhaps I  
7 didn't have two jobs because all I do is  
8 sit and the Governor's never actually in  
9 New York City, so that wasn't a job. And  
10 the other job, which was being senior  
11 briefer, was just me waiting for the  
12 speeches to be done and copying and  
13 pasting words. That was probably my most  
14 memorable argument with her.

15 Q. What did you say to her when she  
16 said you really didn't do anything?

17 A. I don't remember off the top of  
18 my head, but -- I don't remember right  
19 now. But the meeting as a whole was  
20 pretty emotional for me and I was angry  
21 and sad. I remember like I don't know if  
22 it was this conversation or another one, I  
23 asked to take off for Christmas and she  
24 said no, and I just remember a period of  
25 time in December in which I was so angry

1 C. Bennett

2 and so hurt and at my wit's end and like  
3 kind of reaching out for help because I  
4 was almost about to go up and quit. I was  
5 at that point where I was like really  
6 reaching my ceiling.

7 MS. CLARK: Do you want to take a  
8 break? I think we might actually need  
9 to take a break soon for changing the  
10 media units they're using, so why  
11 don't we take us off the record and  
12 we'll take a short break.

13 THE VIDEOGRAPHER: Is that okay  
14 to go off the record?

15 The time is 11:50. We're going  
16 off the record.

17 (Whereupon a break was taken)

18 THE VIDEOGRAPHER: The time is  
19 approximately 12:07 p.m.

20 We're back on the record.

21 Q. Okay.

22 This morning you mentioned that  
23 Staffer #5 told you that he bought coffee for  
24 the Governor and you would have to do the  
25 same.

1 C. Bennett

2 When you became executive  
3 assistant, did you start buying the  
4 Governor coffee?

5 A. Yes.

6 Q. And did anyone other than Staffer #5  
7 tell you that this is something that was  
8 expected of you?

9 A. I don't know if it was ever  
10 explicitly said; it just began. And Staffer #5  
11 was my tutorial in many ways.

12 I will say that, at Staffer #5's going  
13 away party, they presented him with a  
14 Dunkin' Donuts gift card or some gift that  
15 was kind of like a joke about the fact  
16 that he spent thousands of dollars on  
17 coffee.

18 Q. He told you he spent thousands  
19 on coffee?

20 A. Yes.

21 Q. Who gave him the Dunkin' Donuts  
22 gift card as the going away present?

23 A. I believe Jill Desrosiers  
24 presented it at the party.

25 Q. And if you could turn to the

1 C. Bennett

2 binder referring to tab four, and these  
3 are some documents that you provided to  
4 us.

5 What are these?

6 A. These are receipts for coffee  
7 for the Governor.

8 Q. And are these receipts that you  
9 paid for out of your pocket?

10 A. Yes.

11 Q. And are these the receipts for  
12 every time you bought the Governor coffee,  
13 or just some portion of it?

14 A. Some portion.

15 Q. And why did you save these  
16 receipts?

17 A. I was angry and thought it was  
18 wrong, and also just wanted a record of  
19 how much money I was spending on this  
20 endeavor, in the same vein of I was  
21 underpaid, I was also -- I just said.

22 Thought it was outstanding that  
23 I was making entry-level salary -- I had  
24 an entry-level salary and I was spending  
25 money for the Governor of New York.

1 C. Bennett

2 Q. Did you ever tally how much you  
3 spent buying coffee for the Governor?

4 A. No, I did not.

5 Q. You said this is only a portion.  
6 Is there a reason why you saved  
7 some receipts but not others?

8 A. Usually I was not the person to  
9 get the coffee, so when the coffee came  
10 back, I would just like throw the receipt  
11 in my desk drawer. So it was a mix of  
12 sometimes I just tossed the receipt out  
13 and didn't have it. Other times I had it,  
14 put it in there. But I didn't really have  
15 necessarily a system. It was more just  
16 like almost a ritual of self-respect.

17 Q. Who went out to get the coffee,  
18 typically?

19 A. There were -- well, anyone. If  
20 there were three people in the office, I'd  
21 be like you, you've got to go get the  
22 Governor coffee, here's my card. But  
23 traditionally it was the drivers, like the  
24 office -- I don't know what their title  
25 would be. They drove the state vehicles,



1 C. Bennett

2 they supplied the office, their offices  
3 were in kind of like the supply room. I  
4 don't know what their title is.

5 Q. But you'd then give them your  
6 bank card to buy the coffee?

7 A. Yes.

8 Q. Did you ever speak to Stephanie  
9 Benton or Jill Desrosiers or anybody else  
10 in a senior position about getting  
11 reimbursed for the coffee?

12 A. No.

13 Q. You mentioned that it was Jill  
14 Desrosiers that gave Staffer #5 the -- you think  
15 the Dunkin' Donuts card.

16 Were Stephanie Benton and Jill  
17 Desrosiers aware that you were buying  
18 coffee out of your own pocket?

19 A. Yes. There were times when like  
20 a few times but sometimes Stephanie would  
21 give me cash instead or use her card  
22 instead. She would also get coffee  
23 sometimes, so it would -- on occasion she  
24 would say here's some money or here's my  
25 card, can you also get me something.

1 C. Bennett

2 Q. Did you ever mention it to the  
3 Governor?

4 A. No.

5 Q. Were you required to buy  
6 anything else using your own money?

7 A. Not that I can remember that I  
8 wasn't reimbursed for.

9 Q. So when you became an executive  
10 assistant, you said that Annabel Walsh  
11 said that the Governor wasn't in New York  
12 City very often.

13 How often was he coming into New  
14 York City when you first became executive  
15 assistant?

16 A. I would on average say he was in  
17 the city half the week.

18 Q. And did that change at any time,  
19 the frequency?

20 A. He was around much more in the  
21 fall.

22 Q. How often was he spending in the  
23 fall in the New York City office?

24 A. It was sporadic, so it's really  
25 difficult to pin down. But I would still

1 C. Bennett

2 say on average half the week or sometimes  
3 you wouldn't see him for a few days and  
4 then you'd see him four days in a row.

5 Q. Can you describe for us what the  
6 culture was like in the Executive Chamber?

7 A. It was extremely toxic,  
8 extremely abusive. If you got yelled at  
9 in front of everyone, it wasn't any  
10 special day. Things needed to happen  
11 immediately, and there was no excuse as to  
12 why it couldn't, even if it was just like  
13 outside of the realm of physics entirely.  
14 It was controlled largely by his temper,  
15 and he was surrounded by people who  
16 enabled his behavior, like surrounded by  
17 yes men -- I'll use that term -- of this  
18 is what he wants, this is what he gets,  
19 and that mood and that anger or that fear  
20 of him suddenly becoming angry definitely  
21 ruled the office and then trickled down,  
22 which is why it was like more stressful  
23 where I sat. But like the stress kind of  
24 seeped out through the thirty-ninth floor  
25 and then it was still stressful on

1 C. Bennett

2 thirty-eight but not as much. It was felt  
3 very like every man/woman for themselves,  
4 don't trust anyone is the advice I got,  
5 just be very wary of your friends. It was  
6 like go cry to your mom kind of attitude  
7 about having a bad day.

8 There were several occasions on  
9 which I saw Jill Desrosiers in tears in  
10 his office. He wouldn't -- he really --  
11 it was hard for me to hear him yelling at  
12 people, and I wasn't even in the room, and  
13 it impacted like my emotional state from  
14 my cubicle outside his office, and it  
15 could be anyone.

16 Q. Who did you hear him yelling at?

17 A. It could be anybody.

18 Q. You said you saw Jill Desrosiers  
19 crying.

20 Anyone else that you saw that  
21 was upset after an interaction with the  
22 Governor?

23 A. I -- so part of my job was  
24 collecting people for meetings. So he  
25 would say -- Stephanie would say we need

1 C. Bennett

2 these five people either as soon as  
3 possible in five minutes, so once he gets  
4 off the phone they can enter the room, so  
5 I was kind of like the wrangler or my  
6 position was the wrangler, and you would  
7 see senior staff standing at my cubicle  
8 like talking to each other in very obvious  
9 distress. Like okay, we're going to go in  
10 there, here's the plan or kind of scheming  
11 with each other to make sure they have the  
12 right answers and they're all on the same  
13 page, visibly stressed, very much dreading  
14 the interaction. And Annabel would do  
15 this thing sometimes where she would  
16 convene everyone or I had convened people  
17 and we were still waiting to get the green  
18 light to like shepherd everyone in, and  
19 she would collect people into her office  
20 and like okay, do these like scheming  
21 sessions and Stephanie would like kind of  
22 burst through her office and be like,  
23 everyone out and correct the behavior,  
24 which Annabel knew she wasn't supposed to  
25 do, which was basically like, you know,

1 C. Bennett

2 let's get our stories straight, and to the  
3 point where it was like actually difficult  
4 to drag some people into the office, and  
5 you could see the stress on their face.

6 Q. Anyone else you saw crying?

7 A. Yeah, I feel like I cried at  
8 times, I know other junior staffers cried.  
9 It doesn't -- I don't know if I have like  
10 a particular example, because it also  
11 wasn't very outstanding.

12 Q. You described a little earlier a  
13 time in August, 2019 where Annabel Walsh,  
14 Stephanie Benton, and Jill Desrosiers were  
15 all yelling at you.

16 Were there any other occasions  
17 where anyone on the senior staff yelled at  
18 you?

19 A. Yes.

20 Q. How many times?

21 A. A number will be difficult. It  
22 wasn't unusual. It wasn't out of the  
23 ordinary. I don't know if I can put a  
24 number to it.

25 Q. Who were the senior staffers who

1 C. Bennett

2 yelled at you at different points in time?

3 A. Jill Desrosiers, Annabel Walsh,  
4 Melissa DeRosa, Stephanie Benton, Dani  
5 Lever?

6 Q. Were any of them worse than  
7 others in terms of their treatment of you?

8 A. Melissa DeRosa is one of the  
9 meanest people I've met in my whole life.

10 Q. And can you describe what leads  
11 you to that description?

12 A. You can hear her screaming no  
13 matter where you're sitting on the  
14 thirty-ninth floor. She could be on a  
15 phone call and you will know, and you  
16 could be on the other side of the floor.

17 And in a lot of ways I  
18 considered myself lucky because, even  
19 though I got screamed at, I also saw a lot  
20 of things that I didn't have to be a part  
21 of and that was almost more -- I don't  
22 know, I just -- there was an instance in  
23 which the Governor was on a radio show  
24 real-time on the phone and Dani Lever is  
25 supposed to be advising him, she's

1 C. Bennett

2 director of communications, so she's  
3 sitting in Stephanie Benton's seat. And I  
4 start getting calls from Melissa, who's  
5 listening to the radio from her office,  
6 and is telling me to get Dani on the  
7 phone, because she's trying to correct  
8 things that he's saying in real-time.

9 So I'm trying to dial  
10 Stephanie's desk and it's not -- like I  
11 tried multiple times, it's not going  
12 through. She comes down there at the end  
13 of the radio show and screams at me. And  
14 I look inside and Dani had taken the phone  
15 off of the receiver because she didn't  
16 want someone calling in the middle of a  
17 radio show. So there was literally no way  
18 that I could have, one, relayed that  
19 message at all because it was real-time  
20 radio or two, gotten through to Dani,  
21 because she took the phone off the hook,  
22 and I just got reamed out, and that was  
23 just -- you know, Stephanie walked by  
24 after and like kind of laughed, like she  
25 knew what Dani had done and didn't say



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2 anything, but she kind of laughed it off.  
3 And that was just Melissa telling me what  
4 to do, and that was nothing out of the  
5 ordinary.

6 Q. Did anyone tell you that she  
7 left working for the Executive Chamber  
8 because of getting yelled at by any of  
9 these -- or treatment by these senior  
10 staffers?

11 A. I think most people left because  
12 of the environment. I don't know if they  
13 would say explicitly I was yelled at by  
14 senior staff so I quit, but I think the  
15 briefer who was hired the same day I was  
16 in January, 2019 lasted a week and she  
17 said it was because her anxiety was -- she  
18 just couldn't handle it. So it was high  
19 turnover, but I also don't want to speak  
20 to one particular person's reasons for  
21 leaving.

22 Q. Did Staffer #5 ever tell you why he  
23 was so eager to leave?

24 A. I think he had a horrible  
25 relationship with the Governor and had

1 C. Bennett

2 endured enough abuse.

3 One of the jokes that was before  
4 my time in that seat, but the escape  
5 button on the keyboard at my desk, Staffer #5's  
6 desk had been whited out because there's  
7 no escape, and that was like a running  
8 joke of like people actively like trying  
9 to leave and not being able to.

10 You know, one staffer -- yeah, I  
11 don't want to speak to particular people's  
12 experiences, but it was extremely brutal.

13 I remember one Saturday morning  
14 I didn't wake up early enough, and there  
15 was nothing going on for the day, but I  
16 didn't wake up early enough and I had  
17 received an e-mail from Melissa early in  
18 the morning, maybe 6:30, that I hadn't  
19 seen until later in the day, and later as  
20 in like maybe 7:30, and she didn't even  
21 seem mad, she didn't even reply with  
22 anything mean, but I literally was like  
23 crying to my parents for like at least an  
24 hour because I didn't see her e-mail  
25 immediately. Like she didn't even need to

1 C. Bennett

2 say you were late on this, it was simply  
3 like I'm -- it's like living in fear and  
4 anxiety and at any moment looking at your  
5 phone and, you know, seeing the meanest  
6 messages, all caps, you know, profanities.

7 Q. And when you talk about all caps  
8 and profanities, would that be from  
9 Melissa DeRosa or other people as well?

10 A. Other people as well, and I was  
11 told I had to do the same in order to like  
12 not get in trouble for something not  
13 happening on a certain timeline. I also  
14 had to exude that same kind of  
15 personality.

16 Q. Who told you you had to exude  
17 that same personality?

18 A. Annabel Walsh.

19 Q. And did you do what she told you  
20 to and tried to behave in the way you saw  
21 the senior staffers behave?

22 A. I tried to be nice about it, but  
23 I definitely like I would set fire under  
24 someone's ass if I needed to, absolutely.

25 Q. And how would you go about doing

1 C. Bennett

2 that?

3 A. An example of the Governor wants  
4 to speak with someone and I'm trying to  
5 get ahold of them, I called their desk  
6 phone, I call their personal phone, I text  
7 their personal phone, I call and text  
8 their work phone, I send them multiple  
9 e-mails where in the subject Gov now.  
10 It's like harassing them until you get in  
11 contact with them and then telling them  
12 you need to be here yesterday, like get to  
13 my desk, and just really making a deadline  
14 extremely clear.

15 Q. Did you ever yell at anybody?

16 A. Yes.

17 Q. How many times did you yell at  
18 somebody?

19 A. I don't remember. I really  
20 tried not to. But there were absolutely  
21 times in which, particularly in moments  
22 where I was getting screamed at, that I  
23 would turn around and say like what the  
24 fuck, guys, or just -- you know, it was --  
25 again, I just didn't feel like it was --

1 C. Bennett

2 didn't feel good, but it was also exactly  
3 what everyone was doing.

4 Q. Did anyone ever talk to you  
5 about being upset about you yelling at  
6 them?

7 A. I yelled at [REDACTED] [REDACTED], and I  
8 still think about it, actually, because I  
9 really -- yeah, I was mad and I was really  
10 tired and I addressed it over the summer,  
11 actually. I was just like I'm sorry, that  
12 was really harsh.

13 Yeah, it felt like it was the  
14 only way to -- it's like what you're told  
15 to do and it also feels at the time the  
16 only way for people to take seriously that  
17 like -- like I'm going to get my ass  
18 handed to me if you don't do your job, so  
19 you need to understand the heat that I'm  
20 getting, so like I also am going to give  
21 you some of that heat and I really tried  
22 not to, but there are absolutely times  
23 that I yelled at my team.

24 Q. If you could turn to tab seven  
25 in the binder in front of you.

1 C. Bennett

2 This is another text exchange  
3 between you and Staffer #5 where he wrote, "that  
4 was a big reason I wanted to leave," and  
5 it looks like you wrote back, "Annabel or  
6 just generally all the bullshit and shitty  
7 people." And he wrote, "Annabel pissed me  
8 off," and then in call caps, "a lot, and  
9 so did other people. LOL."

10 Did he ever tell you about any  
11 experiences he had with Ms. Walsh?

12 A. He had similar issues with her,  
13 but their dynamic was very different,  
14 because she was my direct boss in my other  
15 role. In his experiences, I think he  
16 pushed back more with her. But she was  
17 definitely very manipulative, very -- I  
18 don't even know how to describe Annabel.  
19 Because one day she could be really nice  
20 and then the next day she could throw you  
21 straight under the bus.

22 I mean, there was at least one  
23 occasion off the top of my head I can  
24 remember her actively trying to blame me  
25 for a mistake that she herself made,

1 C. Bennett

2 which, I mean, I wouldn't do that to my  
3 own team. And I just had a lot of  
4 problems with her again professionalism,  
5 leadership, and behavior.

6 She would throw someone straight  
7 under the bus to secure her own position,  
8 look good in any way, save face.

9 Q. And you mentioned the occasion  
10 where the three senior staffers yelled at  
11 you.

12 Did Stephanie Benton yell a lot?

13 A. Stephanie doesn't -- well,  
14 Stephanie of course yells, but she more so  
15 speaks quietly and meanly where her  
16 yelling at you may just be normal volume  
17 and just like tear you down from the  
18 inside out, but she wouldn't raise her  
19 voice one bit.

20 Q. What sort of things would she  
21 say that would be mean that would have  
22 sort of the impact that you just  
23 described?

24 A. I can't think of an example off  
25 the top of my head.

1 C. Bennett

2 Q. Did you ever hear anyone in the  
3 office use the term "mean girls?"

4 A. Yes.

5 Q. And who did you understand that  
6 referred to?

7 A. Stephanie, Annabel, Dani,  
8 Melissa. I was never quite sure where  
9 Jill fit into that. I think Jill was a  
10 part of that group, but I wouldn't -- I in  
11 some ways would almost -- I guess she was  
12 a part of it.

13 Q. And who did you hear using the  
14 term "mean girls" to refer to that group  
15 of women?

16 A. I couldn't tell you. I don't  
17 know where it came from.

18 Q. Did you ever use the term to  
19 refer to them?

20 A. It's very possible. It's very  
21 possible.

22 Q. Did you ever hear the Governor  
23 use the term "mean girls" to refer to  
24 them?

25 A. No, but he was very aware of the



1 C. Bennett

2 behavior happening.

3 Q. What's your basis for saying  
4 that?

5 A. It felt as if in some ways he,  
6 rather than yelling at people, part of his  
7 game -- referring back to what I said  
8 before -- like his test is setting up  
9 someone in a position where they're being  
10 abused by the people around him and not  
11 just directly from him. He is aware that  
12 they are mean and maybe will even rile  
13 them up and say or do something or like  
14 throw a slight into a conversation that  
15 rocks the boat and then can kind of watch  
16 from the sides as they kind of take the  
17 lead on being the meaner ones.

18 I mean, there was -- I don't  
19 know who told me, but I was told that he  
20 enjoyed Melissa keeping her door open so  
21 he could hear her screaming at people from  
22 her office during the workday.

23 Q. Who told you that?

24 A. I don't know.

25 Q. Did anyone ever tell you that

1 C. Bennett

2 the Governor and Senior Staffer #1 [REDACTED] had more  
3 than a professional relationship, any sort  
4 of romantic or sexual relationship?

5 A. I questioned it. Other people  
6 who potentially I feel like there's always  
7 kind of the like you get happy hour with  
8 your cove workers and there's speculation.  
9 Again, I don't have specific names of like  
10 this person thought that they had slept  
11 together, but my -- I was really confused  
12 by his relationship with Senior Staffer #1 ,  
13 Senior Staffer #2 , and Senior Staffer #3 in particular.

14 And continuing to answer your  
15 other question about the mean girls, you  
16 know, at one point early in my time as  
17 executive assistant, he called me in and  
18 then called Stephanie in and addressed his  
19 relationship with Stephanie to me while  
20 she was sitting next to me. And it felt  
21 very clear that he was establishing  
22 certain dynamics and it was a little bit  
23 bizarre, just the we've been together for  
24 X number of years, which is him referring  
25 to the fact that she had worked for him

1 C. Bennett

2 for a very long time.

3 I just always suspected that he  
4 probably [REDACTED] with [REDACTED] [REDACTED] [REDACTED] [REDACTED],  
5 but I never had any concrete evidence of  
6 that.

7 Q. And the three were Senior Staffer #1  
8 [REDACTED], Senior Staffer #2 [REDACTED], and Senior Staffer #3  
9 Senior Staffer #3 ?

10 A. Yes.

11 Q. Other than just this, can you  
12 put your finger on anything that led you  
13 to have that feeling that he had [REDACTED]  
14 with [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] ?

15 A. It was -- he would talk very  
16 casually with them. It didn't seem like a  
17 professional relationship. It seemed like  
18 -- like sometimes when he was yelling at  
19 Senior Staffer #2, it sounded almost like -- it  
20 just wasn't a professional relationship,  
21 and I could not for the life of me figure  
22 out what was going on. But there was a  
23 lot of like personal stuff going on -- I  
24 don't know how to even describe it. It  
25 was so bizarre.

1 C. Bennett

2 And as my relationship with the  
3 Governor grew, my relationship with  
4 particularly Annabel, but Stephanie, too,  
5 though I think she kind of rose above  
6 feeling intimidated by me, but Annabel  
7 definitely disliked my relationship with  
8 the Governor, and it couldn't make sense  
9 like any other way. Because I was not  
10 trying to sleep with the Governor, I  
11 wasn't flirting with the Governor, I  
12 wasn't entertaining these things, but then  
13 she would enter the room or enter the  
14 situation and it felt like I had stepped  
15 on her toes in a way that it didn't make  
16 sense to me unless she was coming from a  
17 very different place than I was, if that  
18 makes sense.

19 Q. And I believe you mentioned  
20 earlier tha Staffer #5 said he thought that  
21 Annabel was jealous of you?

22 A. Yes.

23 Q. Did anyone else make that  
24 comment to you?

25 A. I think -- I feel like I talked

1 C. Bennett

2 about it maybe with Staffer #2 [REDACTED] or [REDACTED]  
3 Staffer #3. I don't know particulars, but I  
4 definitely -- I feel like the tension  
5 between us was after a point well  
6 understood by junior staffers.

7 Q. If you could turn to tab nine.  
8 It's more of your texts with Staffer #5.

9 A. Uh-huh.

10 Q. And this is from August of 2019.  
11 And you wrote, "also, he added me to his  
12 phone contacts."

13 Is that a reference to the  
14 Governor?

15 A. Correct.

16 Q. And you continued. "And we were  
17 PINing each other and they were all in the  
18 chain. Obviously don't think they liked  
19 that."

20 Who was the "they" you were  
21 referring to?

22 A. That would be Annabel,  
23 Stephanie, Jill is definitely on that  
24 chain, though I don't think I ever -- I  
25 never got any of that from her, Dani was

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C. Bennett

typically on those chains. But I really  
-- it felt the worst came from Annabel.

Q. And so what you were saying  
here, just to make sure I understand, is  
you didn't think they liked the Governor  
was now in direct contact with you?

A. Correct.

MS. CLARK: Why don't we take a  
lunch break now. Why don't we go off  
the record and we can talk about that.

THE VIDEOGRAPHER: Thank you.

The time is 12:42.

We're going off the record.

(Lunch recess taken at 12:42  
p.m.)

1 C. Bennett

2 A F T E R N O O N S E S S I O N

3 May 26, 2021

4 1:34 p.m.

5 THE VIDEOGRAPHER: The time is  
6 approximately 1:34 p.m.

7 We're back on the record.

8 C H A R L O T T E B E N N E T T, having  
9 been previously duly sworn by a  
10 Notary Public of the State of  
11 New York, upon being examined,  
12 testified as follows:

13 EXAMINATION CONTINUED BY

14 MS. CLARK:

15 Q. You had talked about the issues  
16 with Staffer #5 when he was leaving.

17 Did you ever hear any discussion  
18 that Stephanie Benton might leave the  
19 Executive Chamber?

20 A. I feel like there were rumors  
21 about people -- I feel like there was  
22 always a rumor of someone leaving at some  
23 point, so it's possible that there was  
24 like gossip at a point about Stephanie,  
25 but I can't particularly recall.

1 C. Bennett

2 Q. I'm going to ask you to turn to  
3 tab twelve in your binder. It's more of  
4 your texts with Staffer #5.

5 And do you know if that's you or  
6 him that starts off by saying, "is Steph  
7 leaving?" It is a little hard to tell.

8 A. This -- it seems like it's me  
9 because [REDACTED] [REDACTED] was a former  
10 briefer. But yeah, this doesn't surprise  
11 me, though I wouldn't have remembered it  
12 without reading this.

13 Q. Do you have any recollection of  
14 what [REDACTED] [REDACTED] told you about  
15 Stephanie Benton possibly leaving?

16 A. She messaged me, because that  
17 was the only way we talked, and probably  
18 just asked if Steph was leaving. And  
19 that's how something like that rumor gets  
20 started. I don't know why she would think  
21 that. But I think she was talking to  
22 other staffers, even though she herself  
23 had left.

24 Q. And did you hear anyone ever say  
25 why they thought Stephanie Benton would be



1 C. Bennett

2 leaving?

3 A. Uh-huh.

4 Q. You have to say yes or no.

5 A. Sorry.

6 Q. I forgot to give you that  
7 instruction at the beginning that uh-uhs  
8 and nods don't work for the court  
9 reporter.

10 A. Yes.

11 Can you repeat the question?

12 MS. CLARK: I forget the question  
13 now.

14 Could the court reporter read  
15 back the question?

16 (Whereupon the requested portion  
17 was read back by the reporter)

18 THE WITNESS: No.

19 Q. This text exchange with Staffer #5  
20 also talks about the possibility of MDR  
21 leaving.

22 Is that Melissa DeRosa?

23 A. Yes.

24 Q. And do you recall anything you  
25 heard about her possibly leaving?

1 C. Bennett

2 A. There was chatter that she would  
3 go to the White House, but again, these  
4 rumors -- I feel like these rumors were  
5 usually serving in some capacity of like  
6 who's going where, who's quitting, who's  
7 moving on, who's getting promoted, very  
8 typical. But I do remember the Melissa  
9 DeRosa rumors generally, because people  
10 were anticipating the election, the  
11 presidential election.

12 Q. So there was talk that, if Joe  
13 Biden won, that she would move to the  
14 White House?

15 A. That was one of the theories,  
16 yes.

17 Q. Any talk of what role she was  
18 supposedly going to assume?

19 A. No, nothing that specific.

20 Q. Now, during the time that you  
21 worked in the Executive Chamber, did you  
22 help out with any recruiting to bring in  
23 junior people?

24 A. Yes.

25 Q. And what did you do in

1 C. Bennett

2 connection with that?

3 A. I would reach out to  
4 particularly Hamilton students, my alma  
5 mater. I think when we were looking for  
6 briefers, as [REDACTED] was leaving, and  
7 similarly when I left the briefing team, I  
8 was definitely a part of finding  
9 replacements. I will say that [REDACTED] [REDACTED]  
10 is not, in my opinion, very good at  
11 finding candidates, and I don't think I'm  
12 alone in that opinion, and so it felt a  
13 lot easier to reach out to folks who were  
14 graduating from our respective alma maters  
15 to try to find people to help us.

16 Q. And you say when you were  
17 leaving the briefing team.

18 Do you mean when you became a  
19 senior briefer or at some other point?

20 A. When I had transitioned to my  
21 role as health policy advisor, I was also  
22 a part of the search for additional  
23 briefers.

24 Q. So which people were you  
25 partially responsible for bringing to the

1 C. Bennett

2 Chamber?

3 A. I don't think I ever  
4 successfully recruited somebody. [REDACTED]  
5 [REDACTED] went to [REDACTED], and [REDACTED]  
6 [REDACTED] had reached out to her former  
7 professor, and that's how [REDACTED] was  
8 introduced to us. I'm not sure how [REDACTED]  
9 came to the job. And I believe there is  
10 another [REDACTED] grad that is on the team  
11 in addition to [REDACTED] now after I fully left  
12 the team.

13 Q. And who is that?

14 A. Her name is [REDACTED], I believe.  
15 Actually, I did -- I was successful.  
16 [REDACTED] -- her name is [REDACTED], I believe it's  
17 [REDACTED] [REDACTED], she went to Hamilton and I  
18 talked to her last year and she is now on  
19 the scheduling team.

20 Q. And when last year did you talk  
21 to her about joining the Chamber?

22 A. It must have been June/July.

23 Q. Of 2020?

24 A. Of 2020, correct.

25 Q. So it was when you were moving

1 C. Bennett

2 to the health policy position?

3 A. Yes.

4 Q. And at that point you were  
5 leaving because of your interactions with  
6 the Governor, which we're going to come  
7 to.

8 Did you have concerns about  
9 bringing [REDACTED] into this environment?

10 A. Yes.

11 I think it was very bittersweet  
12 even finding other people to join the  
13 team. After my experience with the  
14 Governor, I was still sad to leave the  
15 team, and it was kind of like cognitive  
16 dissonance. I felt that like maybe they  
17 were young enough and like right out of  
18 college that they wouldn't have a similar  
19 problem. Like I don't know. I did  
20 struggle with it, and I think that's why I  
21 ended up telling [REDACTED] [REDACTED] ultimately  
22 what happened, and I regarded her as like  
23 a dear friend, as somebody I would trust  
24 in the administration, which was rare, and  
25 like kind of in the hopes that she would

1 C. Bennett

2 remain the -- not that I explained this to  
3 her, but kind of keep an eye for the other  
4 women. She was a little less drinking the  
5 Kool Aid I think than some of the other  
6 people.

7 Q. When did you tell [REDACTED]?

8 A. I, on a few different occasions,  
9 had said it in different ways. I think I  
10 tried to explain away my departure from  
11 the briefing team as like something  
12 personal happened to me, like I'm having  
13 personal issues and it means I can't do  
14 this job anymore.

15 And then there was one night  
16 very end of June in which I told her and a  
17 few others while we were drinking that he  
18 -- that the Governor acted inappropriately  
19 towards me, which is why I left my job,  
20 and that was ultimately like the moment  
21 when I actually disclosed the truth, and  
22 then we had several longer text exchanges  
23 about my departure after that period.

24 Q. And the gathering you described,  
25 that was at the very end of June?

1 C. Bennett

2 A. Correct.

3 Q. Who else was present for that?

4 A. Staffer #2 [REDACTED], Staffer #3 [REDACTED],  
5 Staffer #4. I think that was it.

6 Q. And which -- did you give them  
7 any detail in how the Governor had acted  
8 inappropriately?

9 A. No, I just explained that it was  
10 inappropriate, I told Jill it was  
11 inappropriate, and my job changed, and I  
12 kept it very, very brief.

13 Q. Did you become emotional when  
14 you were describing it to the people?

15 A. Yes, I was drunk, so I could --  
16 yes.

17 Q. Well, let's step back in time a  
18 little bit.

19 After you took on the executive  
20 assistant role, how often did you interact  
21 with the Governor?

22 A. It would vary. So if -- as I  
23 said before, if on average he was around  
24 about half the week, some of those days I  
25 wouldn't have any substantive interaction

1 C. Bennett

2 with him at all, and other times we would  
3 have longer conversations. So it really  
4 varied.

5 Q. So in the May through the  
6 summer, did you have any notable  
7 interactions with the Governor?

8 A. Yes. And actually, I'm glad  
9 that you asked this.

10 You asked me earlier if he was  
11 inappropriate towards me that summer, that  
12 year, and I took a very long pause and I  
13 said no, and I want to fix that answer.  
14 And I think what I was grappling with then  
15 and what I'll explain now is that it was  
16 in my mind -- at the time like I largely  
17 saw him as a father figure. He's a little  
18 older than my dad, I'm the same age as his  
19 daughters, so I really tried to think of  
20 it in that framework. But he was -- like  
21 I felt his eyes on me, and I think the  
22 conversations we had and the favor from  
23 the Governor now to me is grooming and I  
24 want to be clear that I feel like his  
25 inappropriate behavior did start then, but



1 C. Bennett

2 I wasn't considering it in that light. I  
3 was like this is a little like maybe  
4 skeevy, but I can handle this and just be  
5 like my professional but friendly self and  
6 that I think my difficulty in answering  
7 your question earlier is that was not  
8 obvious to me until it escalated to the  
9 point which it did.

10 But we did various interactions.  
11 He asked me the length of my previous  
12 relationships. He asked me if I was in a  
13 relationship. He asked me if I honored my  
14 commitments, which I was very early on in  
15 how I interpreted him trying to determine  
16 whether or not I was trustworthy. We  
17 talked about my gym habits, which is  
18 largely because that was like a very  
19 serious and important hobby to me, but I  
20 think looking back inappropriate that -- I  
21 don't know, I just feel like it like  
22 doesn't feel right to me and I think that  
23 was the context in which I was seeing  
24 these interactions with Stephanie and  
25 Annabel and Melissa.

1 C. Bennett

2 Sorry, I interrupted you.

3 Q. Let's pause there.

4 So you used the phrase  
5 "grooming."

6 What did you mean by that?

7 A. I define grooming as a set of  
8 behaviors that establish a friendly  
9 relationship in which certain  
10 interactions, certain friendly behaviors  
11 are acceptable. It's building a  
12 foundation on which to then take advantage  
13 of that foundation and cross a line in a  
14 major way. When he's asking me about if  
15 I'm in a relationship a few weeks after I  
16 met him, in that moment I'm not thinking  
17 of it in any significant light, but then a  
18 year later if he's asking me if I sleep  
19 with older men, the only way he can get to  
20 that question is to first start with a  
21 relationship with me in which it's even  
22 okay to ask about my romantic life at all.  
23 So I think it's about priming the person  
24 in which you're grooming to slowly accept  
25 escalating behavior.

1 C. Bennett

2 Q. And you said he asked about your  
3 prior relationships.

4 When did he do that?

5 A. That was the first month I was  
6 working directly for him.

7 Q. And what did you tell him, if  
8 anything, about any prior relationships?

9 A. I said that I was not currently  
10 in a relationship. I explained that my  
11 last relationship ended, and then after it  
12 had ended, my ex-partner was hit by a car  
13 or a van in New York City, [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
15 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] and that I left my job in D.C.  
17 to [REDACTED] [REDACTED] [REDACTED] [REDACTED], and that was  
18 the reason I was looking for a job in New  
19 York.

20 Q. And when he asked you whether  
21 you honored your commitments, when was  
22 that conversation?

23 A. That was in May. That was one  
24 of the first weeks I had met him.

25 Q. And when he asked if you honored

1 C. Bennett

2 your commitments, what did you say to him?

3 A. I said yes. The first answer I  
4 gave was like I graduated, I honored my  
5 commitment to school, like I saw myself as  
6 a very serious student. And at that time  
7 if I were talking to my friend and they  
8 asked that question, I would have talked  
9 about my campus sexual assault activism on  
10 campus, and I was not at that point at all  
11 sharing that with him, so I just mentioned  
12 school as like a vague like I did it. And  
13 so he asked me where did I go to college,  
14 what did I study, and he -- at one point,  
15 it was either when I first met him when he  
16 originally asked me where I went to  
17 college or in this conversation, but he  
18 was like testing me on who was the  
19 president of my college. And then he was  
20 like okay, yeah, like another commitment,  
21 because that wasn't satisfactory. So  
22 that's when I was explaining that my  
23 commitment was to the people in my life  
24 and I committed to taking care of someone  
25 who took care of me.

1 C. Bennett

2 Q. And you said that you noticed  
3 that his eyes were on you.

4 What did you mean by that?

5 A. Like taking in my outfit.

6 Q. Like looking you up and down  
7 sort of thing?

8 A. Yes.

9 Q. And you said he also asked you  
10 about your gym habits.

11 What did he ask you about that?

12 A. We got into a longer  
13 conversation about -- I'm not even sure  
14 how it started, but I actually talked to  
15 him -- because I was also living with my  
16 parents at the time. I talked to him a  
17 lot about my parents, and that's how I  
18 relate to him in a lot of ways. He has a  
19 similar not personality, because I feel  
20 like this would be an insult to my father,  
21 but they are similar in certain ways and  
22 they both like motorcycles, they both like  
23 sports, and they -- we would talk about  
24 skiing and we would talk about the gym and  
25 we would talk about motorcycles and we

1 C. Bennett

2 would talk about cars and he told me to  
3 get like a grill for my dad for Father's  
4 Day, which I absolutely did not do. But  
5 it was kind of the gateway into like,  
6 yeah, I'm boxing right now, I take the gym  
7 really seriously, these are the hobbies I  
8 do but these are also the things that I  
9 share with my dad. We talked about my  
10 parents and talked about -- he asked how  
11 many like push-ups I could do, and that  
12 was ultimately the beginning of the  
13 push-up competition.

14 Q. And when did that start with the  
15 push-ups?

16 A. That must have been in the --  
17 that was in the summer of 2019.

18 Q. And did that continue past the  
19 summer?

20 A. Yes, that continued until --  
21 actually, I think he even mentioned it in  
22 our COVID interactions, so even 2020.

23 Q. And did there come a time when  
24 he asked you to do push-ups in front of  
25 him?

1 C. Bennett

2 A. Yes.

3 Q. Did that happen once or more  
4 than once?

5 A. Once. But it felt like -- I had  
6 almost been anticipating it, because it  
7 felt like he kept bringing it up. Like  
8 eventually he's just going to be like just  
9 get on the floor and do the push-ups. So  
10 it happened once, but it was like after  
11 conversations.

12 Q. Was anyone else present when he  
13 told you to do push-ups?

14 A. No.

15 Q. Did he do any push-ups?

16 A. He did one push-up one time  
17 before this interaction in which he was  
18 like -- and again, in hindsight this gives  
19 me -- this makes me uncomfortable, he was  
20 like how far down do you go, and he put  
21 like an ornamental plate that has a stand,  
22 so it's upright and it's probably like an  
23 award of some kind he had on the shelf and  
24 he put it on the floor and then he was  
25 like try to make an example of how far

1 C. Bennett

2 down he would bring your chest to a  
3 push-up, but it didn't work because the  
4 plate was like a plate which was pretty  
5 high and it didn't actually -- it was very  
6 awkward, and then he got up.

7 But no, he never got down and  
8 did like sets of push-ups, no.

9 Q. If you could turn to tab  
10 sixteen, it's more of your texts with Staffer #5  
11 from October of 2019 where you wrote, also  
12 an update, he just made me do twenty  
13 push-ups.

14 Is that when that incident  
15 happened?

16 A. Yes.

17 Q. It then says, "loved a woman  
18 after my own heart."

19 Do you know what that's a  
20 reference to?

21 A. So I think on iMessage, I don't  
22 know what Staffer #5 was referring to when he  
23 said, "a woman after my heart." But I  
24 think it -- it didn't have to do with  
25 push-ups.



1 C. Bennett

2 Q. And at the end [REDACTED] wrote, "so  
3 he's in with nothing to do but pick on  
4 you."

5 Is that the feeling you had?

6 A. Yes, he would get bored and  
7 didn't really have a life.

8 Q. If you turn to tab seventeen,  
9 this is images you produced.

10 Who are these texts with?

11 A. These are my parents.

12 Q. At the bottom you wrote, "Gov  
13 and I are going to live together in his  
14 mansion gym." And this is from August of  
15 2019. "Are going to live together in his  
16 mansion gym."

17 Is that something that the  
18 Governor proposed to you?

19 A. Yes. It was definitely not  
20 something I took seriously, but yes, he  
21 mentioned that he had a gym at his house  
22 and that I should see it.

23 Q. If you turn the page, your mom  
24 writes, "that photo wasn't enough."

25 Do you know what that's a

1 C. Bennett

2 reference to?

3 A. I -- I am not sure. It could  
4 have been -- no, I'm not sure.

5 Q. And further down your mom says,  
6 "how did this plan hatch," and you  
7 describe him asking what you did for  
8 sports and leading to him asking how many  
9 push-ups.

10 Is that how you recall the  
11 conversation taking place with the  
12 Governor?

13 A. Yes.

14 Q. On the next page further down  
15 you wrote, "he was like do you have a BF.  
16 I said no."

17 Is that a reference to  
18 boyfriend?

19 A. Yes.

20 Q. And then you continue it. "He  
21 said, well, that's why, you could beat  
22 them all up."

23 Is that something that the  
24 Governor said to you?

25 A. Yes.

1 C. Bennett

2 Q. And if you'd like at tab  
3 eighteen. You wrote -- this is to your  
4 parents again -- it's a little blurrier.

5 A. Correct, this is from my  
6 parents.

7 Q. And that's you writing, "did the  
8 push-ups for him today. He freaked out.  
9 He looks scared now. I just kept going  
10 until he told me to stop and didn't slow  
11 down."

12 Is that what happened?

13 A. Yes, that is what happened.

14 Q. And describe how he looked where  
15 you say he freaked out, he looked scared.

16 A. He just -- I literally don't  
17 believe -- he just didn't believe that I  
18 could actually do a single push-up is the  
19 look that was on his face, and then he,  
20 you know, as it says, that he was like I  
21 don't know many people who can do push-ups  
22 like that.

23 Q. And further down it says, "and  
24 then before he left, he was like that was  
25 scary, I'm officially scared."

1 C. Bennett

2 Is that something he said to  
3 you?

4 A. Yes. He gave me a fist bump as  
5 well.

6 Q. In the early months, May through  
7 the summer -- I cut you off to pause for  
8 these -- what other things do you recall  
9 the Governor doing that made you  
10 uncomfortable or you thought might be  
11 inappropriate?

12 A. Yeah, I feel like this was  
13 inappropriate, and I feel like the  
14 questions about my personal life were  
15 inappropriate and it was the inquiry where  
16 at the time I was just trying to form a  
17 relationship with my boss and also like a  
18 very clear context of telling this to my  
19 parents, like I did not feel like this was  
20 the beginning of him grooming me but I  
21 think within the context of feeling ogled  
22 or the personal questions, yeah.

23 Q. When you were doing the  
24 push-ups, how close to you was the  
25 Governor standing?

1 C. Bennett

2 A. He was sitting at his desk.

3 Q. And describe to me where you  
4 were in relation to his desk.

5 A. I was feet from his desk. I  
6 don't remember exactly, but I even feel  
7 like I was half in Stephanie's office,  
8 like my legs may have been in Stephanie's  
9 office. I don't remember, but I wasn't --  
10 like he wasn't like standing over me.

11 Q. Could he have a clear view of  
12 you while you were doing the push-ups from  
13 his desk?

14 A. Yes.

15 Q. And did you feel he was ogling  
16 you or looking you up or down or anything  
17 like that when you were doing the  
18 push-ups?

19 A. I felt at the time that -- and  
20 to be fair, I don't remember what I was  
21 wearing, but I felt safe in what I was  
22 wearing. Like there are some blouses that  
23 you absolutely are not going to get down  
24 and do push-ups because they will fall  
25 open, and that was not the case, and I

1 C. Bennett

2 remember feeling at least good about that.

3 Q. Did the Governor ever ask you to  
4 sing for him?

5 A. Yes, he did.

6 Q. When did that happen?

7 A. That was in I believe May. It  
8 was very early on working for him  
9 directly.

10 Q. And tell us how that came about.

11 A. In one of my earlier meetings  
12 with him, he called me into his office,  
13 and at this point I still didn't know him  
14 very well, I didn't know my role very  
15 well, Staffer #5 was still around, so it was very,  
16 very early on. So when I get called into  
17 the office, it's like immediate  
18 adrenaline. I don't know what could  
19 happen, anything could happen. I go, I  
20 sit down across from him, and he had  
21 lyrics to Danny Boy and he asks me if I  
22 know the song. We kind of discuss the  
23 song, he reviews the lyrics a little bit,  
24 and then hands them to me and asks me to  
25 memorize them. And I take it. You know,

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
2 I tried to kind of like play it off, but I  
3 was actually literally struggling to  
4 memorize these lyrics, because I didn't  
5 really know the song very well, not that  
6 it matters.

7 I sat back down with Staffer #8 and I'm  
8 trying to memorize these lyrics and he  
9 like would pop out of like the side door  
10 of his office, so not the door that he  
11 usually uses where it goes straight to  
12 Stephanie's office but the side door that  
13 pops right out to my cubicle, and he would  
14 like poke his head out and ask me to  
15 start, and it was kind of like a day of  
16 sitting with these lyrics. And then at  
17 one point Melissa walks into Stephanie's  
18 office, the Governor is I guess at that  
19 point in Stephanie's office, Stephanie I  
20 believe is at her desk at this point, and  
21 he calls me in and asks me to -- he asked  
22 me to sing Danny Boy.

23 And I don't know if I had  
24 started yet, but Melissa was just like --  
25 even she was like -- she said, she was

1 C. Bennett

2 like, this is hazing. And I turned to her  
3 and I said, yes, this is hazing, like  
4 trying to be confident but like jovial  
5 enough that I'm not like about to like get  
6 angry but yes, this is hazing. And then I  
7 turned back to the Governor and I start  
8 reciting the lyrics, just simply speaking  
9 the lyrics. And then he asks me to stop  
10 and asked me to sing. And I was like I'm  
11 not going to sing. He was like, no, no,  
12 you have to sing. I'm like I'm not going  
13 to sing. He was like, we'll do it  
14 together.

15 So he starts singing and I'm  
16 like kind of singing along with him, but  
17 it's like very tragic -- it just didn't --  
18 Melissa and Stephanie are kind of  
19 horrified and it falls apart, and I don't  
20 think -- I think he maybe actually tried  
21 to get through the whole song, but I  
22 didn't know the lyrics and I wasn't like  
23 going to sing, I was more just like  
24 following his lead, and then I sat back  
25 down at my desk with  .



1 C. Bennett

2 Q. Did the Governor ever tell you  
3 why he wanted you to memorize Danny Boy or  
4 why he had the printout of the lyrics or  
5 anything about any reason for any of this?

6 A. No. But when I sat down, Staffer #5  
7 just said like I told you, like he's  
8 testing you, he's testing your  
9 temperament, your confidence, your ability  
10 to handle yourself, anxiety, your memory.  
11 And I just -- at that point I was like,  
12 well, all right, this is what I have to  
13 do.

14 Q. If you could look at tab  
15 thirteen. And this is a document that you  
16 produce to us.

17 What is this?

18 A. This is a conversation with my  
19 best friend [REDACTED], and I'm explaining the  
20 day. He asked if I honored my  
21 commitments, he asked about my  
22 relationships, yes, he asked also how long  
23 my relationships were, in addition to the  
24 other things that I had previously  
25 mentioned. And [REDACTED] drunk and joking

1 C. Bennett

2 around. She says, "at least all of your  
3 relationships lasted longer than they  
4 actually should," which at that point was  
5 true. And I'm explaining, I told him I  
6 stuck by the people in my life. I told  
7 him about [REDACTED], who was my former partner

8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. And it looks like on the second  
10 page that asking you to memorize the  
11 lyrics to Danny Boy was the same day he  
12 asked you if you honored your commitments?

13 A. Yes, it does seem that. Yes.

14 Q. And these texts run May 16,  
15 2019.

16 You texted [REDACTED] about it the  
17 same day it happened?

18 A. Yes.

19 Q. And if you look at tab fourteen,  
20 are those texts with your mom?

21 A. Yes.

22 Q. And that's also from May 16, and  
23 you told your mom about the Danny Boy as  
24 well?

25 A. Yes.

1 C. Bennett

2 Q. Were there any other occasions  
3 where the Governor asked you to sing or  
4 memorize a song?

5 A. No.

6 Q. If you could turn to tab  
7 fifteen.

8 A. Oh, my God.

9 Q. This is a text from you to Staffer #5  
10 dated January 1, 2020 saying, "he just  
11 asked me to sing Bohemian Rhapsody, so."

12 A. I totally forgot about that  
13 until seeing this message. And I barely  
14 remember the interaction. But yeah, that  
15 was New Year's Day.

16 Q. Now that you've seen that, do  
17 you remember anything about what happened  
18 in that interaction?

19 A. I think I just was like I'm not  
20 singing -- I think he started singing and  
21 I was just like I'm not singing that. I  
22 don't remember, but I think I -- I don't  
23 remember quite well, but I really don't  
24 think I sang it.

25 Q. And you had to work on New

1 C. Bennett

2 Year's Day?

3 A. Oh, 9:00 a.m. I was in the  
4 office, yes.

5 Q. Was it staffed the way it would  
6 be on a weekend, or was everybody in on  
7 New Year's Day?

8 A. It was Melissa, the Governor,  
9 and myself.

10 Q. Do you recall if there was a  
11 particular event or occasion that was  
12 requiring you to be there on New Year's  
13 Day?

14 A. Just it's also, in terms of who  
15 else was there, it's possible that there  
16 was staff that popped in and out. But I  
17 was staffing the Governor on New Year's  
18 Day. I don't know why he was there. I  
19 got his coffee, I got them lunch, I waited  
20 for them to leave. There may have been an  
21 event. I don't particularly remember.  
22 But yeah, I do remember working that day.

23 Q. Did the Governor ever make any  
24 comments about the size of his hands?

25 A. Yes.

1 C. Bennett

2 Q. How often did he make comments  
3 about the size of his hands?

4 A. To me just once, but it was  
5 something that other people had mentioned,  
6 just that like he has kind of -- well,  
7 like kind of -- will really kind of grab  
8 you and has large hands. And he was  
9 asking me one day -- I was sitting at  
10 Stephanie's desk and [REDACTED] [REDACTED] was  
11 sitting at my desk and he was asking me  
12 where -- I don't know what the exact line  
13 of questioning was, but I remember talking  
14 about [REDACTED] [REDACTED]. He was asking  
15 like who went where and who's who. He  
16 doesn't really know what's going on in the  
17 office, so he was kind of doing that line  
18 of questioning, and I was explaining that  
19 [REDACTED] had my job before I did. He had  
20 met [REDACTED] and she had staffed him on  
21 several occasions. He asked where she  
22 went, and I told him that she now was  
23 working for the [REDACTED]. And he was like,  
24 okay.

25 And then he asked me maybe what

1 C. Bennett

2 else people had said about him, and I  
3 wasn't really sure. I think we had like  
4 an exchange of, you know, here are some  
5 like very brief things to know about the  
6 Governor before starting this job, and I  
7 think maybe his -- I'm not sure if I  
8 mentioned his hands or he mentioned his  
9 hands, but he wouldn't let it go and kept  
10 asking and talking about the size of his  
11 hands and was like kind of engaging me in  
12 this what became very uncomfortable  
13 interaction in which I was more scouring  
14 my brain for like a positive thing people  
15 had said to him about this job and it  
16 turned into him sticking to this point and  
17 like pointedly joking and asking me and  
18 talking about his hands and the size of  
19 them. And at this point Annabel like  
20 stepped in front of me and said something  
21 to him that was like kind of riffing off  
22 of his line of jokes, and that to me was  
23 -- I couldn't help it in those moments.  
24 She felt like she was interrupting  
25 something where I was like okay, thank

1 C. Bennett

2 God, like she's here and she stepped in.  
3 But I think in her mind she was like I'm  
4 going to step in front of her because I  
5 can and I'm asserting my dominance where I  
6 was like trying, like get me out of this  
7 interaction. And it just felt -- like  
8 when I mentioned it, it was like shake his  
9 hand, he has really large hands, just like  
10 became him trying to get me to admit  
11 something sexually; what do people say  
12 about that, that kind of trying to get me  
13 to say more.

14 Q. Do you recall anything else he  
15 said about the size of his hands?

16 A. That was the only interaction.  
17 I don't remember much. I really was just  
18 trying to like thread this needle of not  
19 making him angry but also maintaining my  
20 -- what I see as appropriate behavior.  
21 Like I'm not crossing this boundary with  
22 you but I'm also not looking to get into a  
23 fight with you and losing my job. That  
24 was the boundary and I was very focused on  
25 that and less listening to what he was

1 C. Bennett

2 saying.

3 Q. What did you have a feeling that  
4 he was trying to get you to say in this  
5 exchange?

6 A. I think he was trying to get me  
7 to say that it indicates other parts of  
8 him are large, and I just don't -- like  
9 that is so -- that makes me so  
10 uncomfortable and I just want to like --  
11 sorry, that just -- yeah. I'm sorry.

12 Q. No need to apologize. Any time  
13 you need a break, let me know. I don't  
14 want to make you uncomfortable.

15 But did you understand that he  
16 was seeking to a comparison of the size of  
17 his hands and the size of his genitals?

18 A. Yes, that is absolutely what he  
19 was trying to get me to say, yes.

20 Q. Did the Governor ever make any  
21 comments about your appearance, either  
22 positive or negative?

23 A. I'd say both. Like when it was  
24 my birthday, he asked like why I was like  
25 all dressed up. It would be like sunny



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2 out and I would be wearing like booties  
3 and he would ask me why I was wearing cold  
4 weather shoes. He went out of his way to  
5 comment on my hair, and this was in the  
6 fall of 2019.

7 And this one hit me -- all of  
8 these isolated incidents, I felt like you  
9 could brush them under the rug, but this  
10 was very clear to me, and this was a  
11 moment in which I was like that's sexual  
12 harassment, and I like very well  
13 understood what was happening at the  
14 moment.

15 But he showed up for the day.  
16 Meanwhile, I'm a mess because I'm working  
17 two jobs, I'm exhausted. I threw my hair  
18 into a bun in the morning and when he's  
19 arriving, I say hello, and usually he'll  
20 say hello. And he just asked me -- he  
21 just like commented on the fact that I had  
22 a bun. I don't know if he asked why I was  
23 wearing a bun or just said your hair's in  
24 a bun, but he commented on my hair and  
25 that was all I got from him.

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2 And then the day went by and I  
3 didn't see or talk to him until he was  
4 leaving for the day and I said good-bye,  
5 and he stops, turns around, walks towards  
6 me, walks like behind my cubicle, and is  
7 standing over me and I'm sitting in my  
8 swivel chair and he asked me why I put my  
9 hair in a bun today.

10 And I was not prepared for that  
11 interaction, but I was stewing on the fact  
12 that he had previously commented on my  
13 bun. So at that point I was like -- you  
14 know, it was like messy, or I kind of made  
15 an excuse. And he was like -- I was like  
16 what, you don't like it, not looking for  
17 his approval but like a what's wrong with  
18 my bun sort of attitude. This is like a  
19 little saltier than I would usually act,  
20 because I was like just actually very  
21 angry. He's like, no, and then he starts  
22 like kind of leaving me again. I was  
23 like, oh, you don't like my bun, and I'm  
24 like leaving over my cube, and then I  
25 stand up and I'm kind of addressing the

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2 other assistants at their cubes and being  
3 like, did you hear that; he doesn't like  
4 my bun, and I'm like kind of calling after  
5 him, and he walks away. And then I start  
6 -- I was like kind of in a crying rage and  
7 just left, left work.

8 And then he called me bun for a  
9 bit, a month or something.

10 Q. When you stood up and were  
11 saying to the other assistants, "oh, did  
12 you hear that," who was present?

13 A. I believe it was [REDACTED]  
14 and Staffer #1 [REDACTED].

15 Q. And did either of them ever  
16 comment to you about you standing up and  
17 making that comment or what the Governor  
18 said to you?

19 A. I brought it up on multiple  
20 occasions after the fact because I was so  
21 bothered by the comment, so I don't know.  
22 We may have had an interaction after he  
23 left, but I also was bitter, so I brought  
24 it up on separate occasions after the  
25 fact.

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2 Q. I'm going to ask you to turn to  
3 tab nineteen. And you produced these,  
4 these are texts between you and [Staffer #5] that  
5 are in the more traditional format. And  
6 it's dated November 18 and you said, "he  
7 only spoke to me twice today and both  
8 times it was to tell me he didn't like how  
9 I did my hair, so definitely quitting.  
10 LOL."

11 Is that the bun incident?

12 A. Yes.

13 Q. Anything else happen in the fall  
14 of 2019 that you thought was crossing a  
15 line or getting close to a line?

16 A. I think these are the big ones  
17 for me. I think the bun was one of the --  
18 it sounds maybe small, but like to me this  
19 was very big. And I feel like we hit on a  
20 lot of the very memorable ones for me.

21 That's what I can remember right  
22 now.

23 Q. Let's move to 2020, from the  
24 beginning of the year until COVID hits.  
25 We can use COVID as the demarcation.

1 C. Bennett

2 What, if anything, happened in  
3 that time period?

4 A. On the 19th of January, I was in  
5 Albany, we were preparing for the Governor  
6 to present the executive budget in a few  
7 days, and I was just like there to help  
8 kind of an all hands on deck. I felt like  
9 I needed to be there and it was kind of  
10 expected of me, and I ended up -- Annabel  
11 asked me to go drop off a speech at the  
12 mansion.

13 On my way, she calls me and  
14 tells me not to drop that speech, which  
15 means like if he gets his hands on it,  
16 you're in trouble. Instead you need to go  
17 pick up the PowerPoint he has. I was like  
18 I'm on my way, I was walking, running.

19 So I get to the gate and I was  
20 like I need to pick something up.  
21 Traditionally, when you're picking  
22 something up, he would give it to somebody  
23 to give it to somebody. A trooper comes  
24 to the gate and I would collect the  
25 PowerPoint that way, like that's how I

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2 would be picking something up from the  
3 mansion in a traditional pickup. A  
4 trooper at the gate said I've got to wait,  
5 I've got to contact him or something. And  
6 I was like it's very cold, it's January,  
7 and I was kind of like waiting. He was  
8 like, go into the command center, which is  
9 like where all the troopers sit, it's kind  
10 of like their office space, you can wait  
11 in there.

12 So I walk across the parking lot  
13 to the command center and sit down and I'm  
14 kind of waiting. They're also waiting.

15 And finally he -- I either -- he  
16 tells them to send me to the pool house,  
17 that he was in the pool house, or he just  
18 said tell her to come here and they said  
19 to me he's in the pool house, some  
20 instruction of that kind.

21 I don't know where the pool  
22 house is, so they're like kind of giving  
23 me instructions.

24 I make my way up. I'm nervous,  
25 because I didn't dress as if I'm about to

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2 see the Governor. My plan was not at all  
3 to see the Governor even that day, Sunday.  
4 I was just kind of there to be helpful to  
5 my team.

6 And I make my way to the pool  
7 house, I can hear the TV, so I continue  
8 past like a pool table on the inside, and  
9 he's sitting there watching CNN kind of  
10 flipping through his PowerPoint, the  
11 executive budget PowerPoint, and I'm  
12 standing there kind of awkwardly because  
13 I'm under the impression I'm to pick it  
14 up, so it's like hand it to me and then  
15 I'll leave, and he asked me to sit down.  
16 It's kind of an L-shaped couch, so I make  
17 my way all the way around and then sit not  
18 next to him, like a good amount of space,  
19 and I'm just kind of sitting there  
20 waiting, like kind of watching CNN kind of  
21 waiting for instruction, feeling a little  
22 bit awkward.

23 And he is like all right, tell  
24 me something, tell me something, like  
25 gossip, kind of in his gossip mode, seems

1 C. Bennett

2 bored with the PowerPoint. I don't have  
3 anything to tell him. I think at one  
4 point I said like everyone is working hard  
5 or something stupid, like everyone is  
6 tired, which he definitely doesn't want to  
7 hear, or something to the effect of like  
8 the staff, the staff mood, and he's more  
9 looking for gossip. And he's persistent,  
10 like tell me something, tell me something.

11 So finally I say, in 2015, you  
12 signed Enough is Enough and it changed my  
13 life. And he puts his pen down and moves  
14 his PowerPoint to the side and is like  
15 fully engaged in this conversation. And I  
16 -- we kind of enter this winding  
17 conversation in which I say it's part of  
18 the reason I'm here doing this work, and  
19 in a lot of ways it felt like I had been  
20 not waiting to tell him but like if this  
21 person who I spend every single day trying  
22 to cater to is going to invest in me at  
23 all, like he should know that this is the  
24 foundation of why I show up every day, and  
25 that was kind of just conversation in



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2 which I explained that I was assaulted and  
3 abused in college and I reported it to the  
4 college and the investigation was just  
5 horrible, the policy was not great, they  
6 really just didn't do it justice, and I  
7 let the campus know exactly what happened,  
8 I let them know what happened to me, and I  
9 let them know how the college responded,  
10 and I started a larger conversation about  
11 our policy about our educational  
12 programming, about what we're going to do  
13 and how we talk to each other and all  
14 these different things, and that Enough is  
15 Enough is one of the first cases that  
16 actually was under the new law, and so the  
17 school was kind of grappling with Enough  
18 is Enough as I was reporting this. And I  
19 ended up studying it as part of my senior  
20 thesis in which I did a survey and all  
21 these different things, so it was very  
22 much an academic endeavor for me.

23 And he said, do you know what  
24 the cone of silence is. Yes. And he was  
25 like, what is it. You know, just stays

1 C. Bennett

2 between us. He's like, yep. And he was  
3 like, I'm going to tell you something, but  
4 you can't talk about it. I was like,  
5 okay. And he said, [REDACTED] was also  
6 assaulted in college and it's been so  
7 hard. And she didn't want it to be  
8 investigated, she didn't want it to be  
9 reported, and I kind of pushed her, and he  
10 kind of described this tension he had [REDACTED]  
11 [REDACTED] [REDACTED] as it related to the  
12 impacts of campus sexual assault, and he  
13 used the word "enlightened," which is  
14 problematic, of like how my response.  
15 He's like wondering what that did for me  
16 and my family and what that meant, and  
17 kind of started this winding conversation  
18 of what happened to me. And within that  
19 he asked some I thought pretty  
20 inappropriate questions, but I assumed it  
21 was -- not even assumed, I'm talking to an  
22 old white guy and he doesn't necessarily  
23 know what's an inappropriate question to  
24 ask, and I feel like I dealt with that --  
25 I feel like when you're studying these

1 C. Bennett

2 things, you kind of meet all types of  
3 people who have some -- know idea how to  
4 speak to a survivor or about it at all and  
5 I was like this man is lost, but he's  
6 trying his best and asking me like what  
7 exactly happened to me or what exactly the  
8 policies like I thought were problematic,  
9 and that gets like very graphic.

10 And I gave him like top line,  
11 but I still felt uncomfortable. And he  
12 was kind of like, oh, well, some people  
13 have it much worse, and then he was kind  
14 of like talking about his own family and  
15 his experience. And he said that he  
16 couldn't get the school to budge with  
17 anything, like he tried everything, and  
18 they just kind of -- not that the same  
19 thing that happened to me happened to [REDACTED]

20 [REDACTED], but that it's really hard to  
21 come forward with a complaint even when  
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
23 [REDACTED], and that is what he saw in his  
24 experience and talking about that.

25 He told me that I shouldn't

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2 pursue it professionally though after all  
3 this, that was his opinion, that I  
4 shouldn't base my career on something that  
5 happened to me in college. And I  
6 explained like, no, this has been in my  
7 life and it's something that I've dealt  
8 with before college even.

9 And then he kind of like asked  
10 me when, as like, when was the first time  
11 kind of questioning. So I said I was  
12 [REDACTED]. And he reiterated, I just don't  
13 think you should base your life off the  
14 pain that you've experienced. And I was  
15 like kind of trying to take his advice in  
16 stride. And he said -- he was like,  
17 listen, there's so many things you can  
18 learn and there's so much you can do and,  
19 you know, you're always going to be on the  
20 losing side of this issue. No one is ever  
21 going to give up power. People in power  
22 are never going to give up power. He said  
23 that almost word for word. And he said  
24 that -- he was kind of describing sexism  
25 at large. But just like it's in the

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2 bedroom, it's in the boardroom, it's like  
3 a much larger everywhere. I was like I  
4 know, I know. But I was like really  
5 trying -- like I appreciated the way in  
6 which he was attempting to meet the  
7 moment, and I saw it as a good faith  
8 effort in that moment, though looking back  
9 I take his comments to be coming from  
10 someone who himself is a perpetrator, the  
11 whole thing disturbs me now.

12 And then we talked about the  
13 briefing book. He asked me -- I was like  
14 maybe I'll go to law school. He was like  
15 don't go to law school. We talked about  
16 different programs and I was like what if  
17 I did like a JD joint degree, you know,  
18 like a Ph.D./JD, I was just kind throwing  
19 things out there that I had been looking  
20 at at the time, and he like didn't really  
21 know much about those programs and he was  
22 like, it sounds interesting. And he was  
23 like I've been telling [REDACTED] to go  
24 into business, not go to law school. He  
25 was like go into business, go into

1 C. Bennett

2 business.

3 And then he was saying -- he  
4 asked me how I liked my job, I said it was  
5 good, and that everything is -- it's  
6 amazing. I get to see his like homework.  
7 I get to have my hands on that every  
8 single day, and that's such a valuable  
9 learning experience for me, and I kind of  
10 described that. And he was like good. He  
11 was like you should stay in that role. I  
12 think you have a lot to learn. And I just  
13 like really valued that he was even  
14 engaging in this level of talking to me  
15 about my career. I feel like it just is a  
16 lot coming from this person, like the  
17 entire universe of this office is  
18 surrounded by this person and for him to  
19 like take a moment to reflect on my career  
20 was like a very important moment at the  
21 time. He said there's too much  
22 information in the book. He was like, you  
23 know, if I'm signing a bill about like  
24 labor laws or a labor bill, I don't need  
25 to know the history of labor law. And I

1 C. Bennett

2 was like I know, I know, but you get the  
3 questions, you get yelled at, do we have  
4 this, do we have XYZ, where's this. And  
5 it has to have that and that's why they  
6 have so much stuff in there, and he was  
7 yeah, I know, I know. I was like, well,  
8 you think of anything, if there's anything  
9 that I can do or the book should be, I  
10 want to know that. And he was like, yeah,  
11 yeah, I'll think about it. And the  
12 conversation was winding down at that  
13 point, and then we walked out of the pool  
14 house together.

15 And then I returned to the  
16 Capitol.

17 Q. How long was that conversation?

18 A. It was significant. It was well  
19 over an hour.

20 Q. And you described sort of how  
21 you look back on it now.

22 At the time did you view it at  
23 the time as a positive conversation?

24 A. I had weird feelings about some  
25 of his comments but I really -- as I said,

1 C. Bennett

2 I genuinely interpreted him as trying his  
3 best to be a thoughtful person in that  
4 moment, even though it felt weird to give  
5 -- how about this: There are very, very  
6 few people I've spoken to in my life about  
7 sexual violence who asked me directly the  
8 violence itself, what was it. And in the  
9 moment I really tried to reason that as he  
10 doesn't get that that's inappropriate or  
11 that that's just like a line most people  
12 do not cross, and I didn't feel great  
13 about it. But I have shared that openly  
14 with my whole campus, and it's something  
15 that people in my life do know, and even  
16 in that moment I was like woah, that was  
17 not a question I was expecting, but I  
18 answered it.

19 Q. If you could turn to tab  
20 twenty-one.

21 This is a text exchange with  
22 your mom?

23 A. Yes.

24 Q. And was that the day of the  
25 conversation?



1 C. Bennett

2 A. Yes.

3 Q. And if you look at the tab  
4 before, tab twenty, it's another one of  
5 the tiny type Staffer #5 text exchanges that  
6 says, "tough, too, because things with Gov  
7 have been really good." That's dated  
8 1/28/20.

9 Was there anything else going at  
10 the time on in January that had you  
11 describing things as going really well  
12 with the Governor at that time?

13 A. No, that single conversation I  
14 felt like I had been desperately seeking  
15 to exit the Executive Chamber, and that  
16 conversation gave me a second wind.

17 Q. Anything else notable happened  
18 between the beginning of 2020 and COVID  
19 hitting?

20 A. Nothing that I am remembering  
21 right now that's significant. That felt  
22 like the real -- the last like unusual  
23 interaction I had with him before the  
24 virus.

25 Q. So then the virus hit, and you

1 C. Bennett

2 described earlier that you were asked to  
3 go up to Albany; correct?

4 A. Correct.

5 Q. And where were you working out  
6 of in Albany?

7 A. I was working out of the new  
8 front office, which was actually outside  
9 of his secure office area. It was across  
10 the hall and it was -- I was sitting with  
11 his other EAs that usually work in Albany.

12 Q. And who were the EAs you were  
13 sitting with?

14 A. Executive Assistants #2 & [REDACTED],  
15 and Alyssa McGrath.

16 Q. And did you share the space with  
17 them throughout the rest of your time in  
18 the Executive Chamber?

19 A. Yes, until I switched jobs.

20 Q. So once you went up to Albany,  
21 you said you didn't see the Governor as  
22 much during the COVID; correct?

23 A. Correct.

24 Q. When's the first time anything  
25 happened during COVID that is notable?

1 C. Bennett

2 A. So I got up there on March 23  
3 and I didn't see him until a few weeks,  
4 maybe mid May. And it was early in the  
5 morning I got an e-mail asking me to drop  
6 off briefings. And at that point the  
7 traditional drop-off format in Albany is  
8 you leave it on the trooper desk and then  
9 you e-mail Stephanie and you say blah blah  
10 briefing is on the trooper desk, and then  
11 she'll come out of the locked secure  
12 office space that they have for COVID  
13 precaution, are kind of isolated, she'll  
14 come out, grab the folder, and go back  
15 inside.

16 So I'll like just throw on  
17 leggings and like kind of a sweatshirt,  
18 I'm a mess, it's early in the morning. I  
19 run to go print the briefing, and it  
20 occurs to me, as I'm dropping the briefing  
21 off, that no one's in the office because  
22 it's so early. And so I kind of -- at  
23 that point I was like, oh, fuck. So I  
24 asked the trooper to let me into his  
25 office.

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2 And I had actually never been in  
3 the Governor's office in Albany, I had  
4 been outside of it where the EAs sit on a  
5 normal non-virus day, but I had never  
6 before been inside his actual office, and  
7 so I kind of just like walked back there  
8 and I'm in like sneakers, a sweatshirt,  
9 and no makeup, and I just throw -- not  
10 throw it but just kind of like place the  
11 folder on the coffee table and turn around  
12 to get out of there. And he's laying down  
13 on the couch with his feet up and he's  
14 like wait, wait, wait, wait, wait. He's  
15 like come back here. I like go and stand  
16 at the door. And he's like something to  
17 the effect of like where have you been. I  
18 haven't seen you around. I'm like hey.  
19 He's like, how long have you been in  
20 Albany. I was like I don't know, like  
21 sixty days, because at that time I was  
22 counting. And then he asked where I was  
23 staying. And then one of the first  
24 questions was asking me who I was hitting  
25 on and who was hitting on me. And I'm

1 C. Bennett

2 still standing in the doorway and he's  
3 still laying on the couch and I'm kind of  
4 like looking down at him, the couch is  
5 like -- comes right to the doorway. And I  
6 dodge questions and kind of give him some  
7 office gossip of like the fact that no one  
8 -- like it was still at that point a very  
9 small operation in Albany. We're kind of  
10 talking about the virus. It was like a  
11 very casual. Besides asking me if I'm  
12 hitting on people, it just felt like we're  
13 catching up.

14 And then I mentioned that I have  
15 a speech for my alma mater. It was like  
16 big for me in that moment of my life and  
17 something I actually was like hoping to  
18 like share with him. And I was operating  
19 off of the last real conversation we had  
20 from January, like I would love to share  
21 what is an exciting development of  
22 returning and talking to these students  
23 who are about to graduate, so I mentioned  
24 it. He's like, sit down.

25 So I grab a chair from the other

1 C. Bennett

2 side of his desk and bring it around to  
3 the other side of the coffee table and he  
4 sits up, and we're chatting. He asked me  
5 about my parents, because he knows I live  
6 with my parents, or I lived with them at  
7 the time. And we start talking about my  
8 speech. And he asked me what I'm going to  
9 say. And I launch into something like  
10 talking about the pain of whatever. And  
11 he stops me and he's like, it's not pain,  
12 it's injustice, and that actual  
13 clarification is something that I included  
14 in my speech as like when I brought this  
15 up to the Governor, he corrected me and  
16 said it's not pain, it's injustice. I  
17 literally put those lines into my speech.  
18 But he is saying that to me. He's like  
19 it's injustice, it's betrayal. And then  
20 he was like you were raped, you were  
21 raped, you were raped and abused and  
22 assaulted. Now he's using his hands to  
23 point at me to like put a point on it, and  
24 he continues to repeat himself. You were  
25 betrayed, you were raped and abused and

1 C. Bennett

2 assaulted and betrayed, and he's kind of  
3 staring me right in the eyes, and I  
4 realize in this moment that that's not an  
5 accident and that he is actually trying to  
6 trigger me, because no person in their  
7 right mind speaks to somebody and thinks  
8 that that's a positive interaction. And I  
9 was like okay, he's testing me, so like  
10 just nod or say yes. And then he -- I'm  
11 like okay, he's in a bad mood.

12 When I had arrived at the  
13 office, we were kind of chatting and  
14 catching up, though not appropriate, it  
15 felt like very much within the scope of  
16 our relationship, as sad as that is, and  
17 this was like all right, I don't know  
18 what's going on. This is fucking bizarre.

19 And then he just like goes off  
20 on a tangent about my speech and telling  
21 me about my speech and trying to write my  
22 speech for me. He gets up, goes to his  
23 desk -- and I'm like -- to give a sense of  
24 how not comfortable I am or like how I'm  
25 trying to be professional and whatever, so

1 C. Bennett

2 I'm still sitting at this chair facing the  
3 coffee table and I'm like turned watching  
4 him at his desk, because I'm like I'm not  
5 going to just get up. And then he's like  
6 oh, you can get up and move your chair,  
7 and that's what I get up and move my  
8 chair. Like I'm not like walking around  
9 his office. I felt very out of my  
10 elements, very uncomfortable, particularly  
11 after his comments about my life and my  
12 past.

13 And then he continues to talk  
14 about the speech and kind of stops and I  
15 try to like change the subject, and I  
16 explain that I've been thinking about this  
17 moment of me sharing my story at Hamilton  
18 as this like kind of transformation in my  
19 life and that watching him in these press  
20 conferences, it seems like there's a  
21 similar transformation happening in his  
22 life, and not that those two are at all on  
23 par with each other, but like I really was  
24 like trying to what in this moment is he  
25 feeling, just the virus is super



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2 emotional. We're like on TV every day,  
3 the office has changed dramatically, COVID  
4 was so emotional for me. At that time I  
5 was like I can't imagine what he's going  
6 through and I'm writing a speech about my  
7 own kind of like turning point in my young  
8 life and like kind of raised this question  
9 of what right now are you thinking.

10 And that didn't go well, because  
11 he interpreted it as we asking whether he  
12 was running for president. He kind of did  
13 the like what are you asking, just ask  
14 what you're asking. And I was like no,  
15 I'm really just wondering. I don't know  
16 if he did answer that at all. He totally  
17 missed what I was even trying to say or  
18 like a larger reflection on thousands of  
19 people dying every day kind and kind of  
20 went to like the fact that he's unhappy  
21 and stressed and he can't sleep and really  
22 what he wants is to like find someone,  
23 like find a lady and drive his motorcycle  
24 into the mountains kind of thing.

25 And then I think we also at that

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2 point touched on if he was losing -- why  
3 he was losing viewers in his press  
4 conferences. And I think the conversation  
5 kind of wound down from there, and Melissa  
6 walked in and that's when I -- like so  
7 much time had passed that people had  
8 showed up to the office, so I just like  
9 walked out.

10 As I was getting up, he handed  
11 me a PowerPoint to give to the PowerPoint  
12 team, so I grabbed that, and ran to the  
13 PowerPoint team and kind of like threw it  
14 at them, was very upset, and I believe  
15 went back to my hotel room to like get  
16 dressed.

17 Q. Did you tell anyone at the time  
18 about that conversation?

19 A. I told Staffer #2 [REDACTED].

20 Q. Anyone else?

21 A. Not off the top of my head can I  
22 remember, but I wasn't very secretive.

23 Q. Did you talk to Staffer #2 [REDACTED]  
24 about it, or did you text him, or  
25 something else or both?

1 C. Bennett

2 A. I texted him and talked to him  
3 about it, so both.

4 Q. And if you turn to tab  
5 twenty-two, those are texts with Staffer #2?

6 A. Yes.

7 Q. And did you talk to him after  
8 this text exchange?

9 A. I'm sure I did.

10 Q. And what was Staffer #2's response  
11 when you spoke to him?

12 A. I think he -- I don't remember  
13 it particularly well, but I feel like  
14 there was a general sense of just  
15 frustration towards the Governor as like a  
16 baseline feeling for staff. So I'm sure  
17 he was just like, you know.

18 Q. What was causing the baseline  
19 frustration?

20 A. Just I think his personality and  
21 like what we touched on earlier of the  
22 dynamics of the office and the fact that  
23 it was also a pandemic, so it was just  
24 stressful and emotional, and I think Staffer #2  
25 particularly was doing so much, so I think

1 C. Bennett

2 he was having his own time of it.

3 MS. CLARK: Why don't we take a  
4 ten-minute break before we get to the  
5 next stage.

6 So if we could take us off the  
7 record.

8 THE VIDEOGRAPHER: Sure.

9 The time is approximately 2:53.  
10 We're going off the record.

11 (Whereupon a break was taken)

12 THE VIDEOGRAPHER: The time is  
13 approximately 3:10.

14 We're back on the record.

15 Q. We just discussed the  
16 conversation you had in mid May with the  
17 Governor.

18 What was the next conversation  
19 or encounter with the Governor where  
20 anything notable happened?

21 A. The next interaction I had with  
22 the Governor was June 5. This was the day  
23 of the most serious allegations that I've  
24 shared with you.

25 I was in the office. It was a

1 C. Bennett

2 Friday. Stephanie asks that Executive Assistant #2 and I  
3 grab legal pads and masks and pens and  
4 recorders and go back to work with the  
5 Governor, dictation.

6 So the two of us go back there,  
7 and we're both sitting across the desk  
8 from the Governor and we make some small  
9 talk. He asks about -- this was odd to  
10 me, too, because Executive Assistant #2 had been working  
11 for him for a while, but he asks about her  
12 name and if she was named after [REDACTED]  
13 [REDACTED], and then they start talking about  
14 like the classic poster of [REDACTED] [REDACTED].  
15 It was like a weird topic. Totally fine.

16 He starts speaking and Executive Assistant #2  
17 goes first, he asks her to go first, and  
18 she's dictating, the recorder is on, and  
19 he stops himself mid sentence to comment  
20 on the fact that my mask goes in and out  
21 as I'm breathing and it reminds him, he  
22 says, of the monsters, like the aliens in  
23 Predator, which is not a movie I seen, but  
24 I like Google imaged it obviously after  
25 the fact, and he's kind of laughing about

1 C. Bennett

2 the mask.

3 And then he makes a comment, you  
4 know, if I were investigated for sexual  
5 harassment, you know, what would I say. I  
6 told her she looked like a monster, and  
7 then started laughing. The last time I  
8 had seen him he had made this really  
9 inappropriate -- these really  
10 inappropriate comments about sexual  
11 violence in my past. Like I was already  
12 on guard. And then when he mentioned  
13 sexual harassment, it felt like he tripped  
14 a wire almost, a total red flag. And I  
15 was kind of like sitting there realizing  
16 he had maybe just said more than he wanted  
17 to say. I'm like, okay, I'm going to be  
18 alone with him because Executive Assistant #2 going to  
19 finish her piece and then she's going to  
20 leave, and we'll go from there.

21 He continues speaking. She's  
22 still dictating but it's on police reform,  
23 and this is June 5, so this right after  
24 George Floyd's murder, and Executive Assistant #2 leaves.  
25 And at this point I'm alone with him, and

1 C. Bennett

2 the first time I've been alone with him  
3 since the previous interaction we just  
4 discussed. And the timeline of events is  
5 a little bit confusing for me because I  
6 was in and out of his office. But I  
7 dictate and I'm writing, and then he  
8 finishes, so I'm like preparing to depart,  
9 and he strikes up a conversation with me  
10 and he was like, oh, how was your speech.  
11 And we kind of like start chatting and  
12 then he was like, oh, turn off your  
13 tape-recorder. And I'm like, oh, all  
14 right.

15 So I turn off my tape-recorder  
16 and we're talking about the speech and how  
17 it went and that it was on my [REDACTED]  
18 birthday, so we're kind of talking about  
19 my birthday and we're talking about COVID.  
20 And he kind of launches into like -- I was  
21 like, how are you, he was like, yeah, I'm  
22 lonely and I'm tired and I can't sleep,  
23 and he's kind of starts lamenting the fact  
24 that work isn't great right now, there's a  
25 pandemic. And then he asks me -- he's

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2 like, I haven't even hugged anyone in so  
3 long, like I can't even hug anyone. I was  
4 like, well, what about your daughters.  
5 Your family has been here, and so that was  
6 kind of my mention. He was like, no, no,  
7 not like that, like a real hug. And that  
8 to me was a very obvious like no, not like  
9 a warm hug, he's talking sexually.

10 And then he turns to me and he  
11 asks like who did you hug last, that kind  
12 of like turn the table on me, and I was  
13 like, you know, it's been really hard  
14 because my parents are high risk and I was  
15 quarantined with them now, when I go to  
16 see them, I can't even go inside without a  
17 mask and we mostly stay outside and I  
18 can't even hug them. And he was like, no,  
19 no, no, like really hug, really hug, like  
20 how long has it been. I was like, oh, you  
21 know, it's been a while. He was like,  
22 yeah, right, like that was kind of the  
23 answer he was looking for.

24 And he starts talking about how  
25 he wants a girlfriend and preferably in



1 C. Bennett

2 the Albany area, and in the same series of  
3 conversations, which the order for me is  
4 it is so jumbled and I felt like so much  
5 is happening, but he asks me if I had ever  
6 been with an older man and I answered that  
7 honestly, and then he asked me if I  
8 thought age mattered in relationships, and  
9 I took a really long -- like I took a  
10 pause and I was like about -- kind of  
11 going on about power dynamics in  
12 relationships, and he cut me off and he  
13 was like, well, I don't think they matter,  
14 I don't think they matter. And then he  
15 mentioned that he would -- he was like  
16 anyone over the age of twenty-two. It was  
17 either twenty-two and up or older than  
18 twenty-two, and I've obviously made  
19 statements in the past about this exact  
20 interaction, but I'm not exactly sure how  
21 it was worded. But he made it clear that  
22 twenty-two was some type of cap for his  
23 intimate relationships. At the time he  
24 was sixty-two. And I just said, oh, like  
25 your daughters, and he ignored me on that.

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2 And in the same series of  
3 conversations we -- he asked me if I -- he  
4 asked me when my last relationship was and  
5 I had it had been several months ago, like  
6 before the pandemic, and he asked how long  
7 that had long on. I said about six  
8 months. And he asked if that was  
9 monogamous to which I said like kind of,  
10 like yes and no. And he took that to be  
11 -- the way the conversation went was we  
12 interpreted that to mean that I was  
13 practicing -- the person I was with was  
14 practicing monogamy but I was not, and he  
15 interpreted this as -- in the context of  
16 my other relationship in which like my  
17 former partner [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
19 And then he alluded to the fact  
20 that perhaps I need to get over my past  
21 and recover from the things that have  
22 happened to me, whether it's my former  
23 partner [REDACTED] [REDACTED] and the sexual  
24 violence piece that I had previously  
25 talked to him about, and that I need to

1 C. Bennett

2 have control in relationships, but I also  
3 don't want to be pinned down, which is why  
4 I want people to be monogamous to me even  
5 though I'm sleeping around, which is --  
6 like I didn't even say that was the case.  
7 He was kind of elaborating on these things  
8 that I wasn't elaborating on. And then he  
9 said that I would -- like once I healed, I  
10 would have like a more serious  
11 relationship.

12 And I did speak on monogamy, but  
13 I tried to keep it very theoretical of  
14 like I do think that people do enter  
15 monogamous relationships for the wrong  
16 reasons and that it can often be about  
17 control and possession and ownership and  
18 just like this automatic reflex to go to  
19 that point of monogamy with someone simply  
20 because that's more comfortable, but that  
21 in fact it should be based more in trust  
22 and honesty and conversation and  
23 communication, and sometimes those pieces  
24 get skipped, and like that conversation he  
25 didn't want to have. And kind of like him

1 C. Bennett

2 cutting me off when he kind of like wanted  
3 to take another turn here, turn there.

4 And he also asked in the same  
5 series of conversations if I had trouble  
6 being with people, are to which I said  
7 yes, and I didn't elaborate too much, I  
8 just said it's a work in progress for me,  
9 and that it's, you know, it will -- yeah,  
10 it takes a lot of work, this takes a lot  
11 of work.

12 I'm trying to think of the other  
13 things that he touched on.

14 At one point I know we were  
15 talking about my birthday and that kind of  
16 thing, so then I like showed him a picture  
17 of the tattoo that I wanted to get for my  
18 [REDACTED] birthday, which at the time I  
19 couldn't get because of COVID, and that  
20 was my way to kind of like change the  
21 topic. And then he told me that I  
22 shouldn't get it on my shoulder but I  
23 should get it on my butt, and he said that  
24 several times. He felt that it was safer  
25 so people wouldn't see it if I were

1 C. Bennett

2 wearing a dress.

3 He asked me about my piercings  
4 and I said that I have sixteen, like I  
5 showed him my ears which I have a lot of  
6 piercings on my ears and he asked if I had  
7 piercings anywhere else, to which I said  
8 no. And then I just was like what about  
9 you and he said no, like it was really  
10 painfully awkward. And like I didn't  
11 really know how to respond to some of  
12 these points. Some of them I responded  
13 more in like theoretical terms. Others  
14 was like the awkward tattoo diversion.  
15 Others I answered just straight up  
16 honestly about my life, sexually or  
17 otherwise.

18 It was between him asking me if  
19 I would or have I slept with an older man  
20 in combination with all these  
21 conversations about my romantic life and  
22 my sex life and the fact that he was  
23 willing to sleep with someone my age as we  
24 had explicitly discussed the fact that I  
25 had turned twenty-five, it was very clear

1 C. Bennett

2 to me that he, over the course of these  
3 conversations, was propositioning me for  
4 sex, and then also in these same  
5 conversations we talked about Black Lives  
6 Matter and press conferences. And I was  
7 at this point fully, fully aware of what  
8 was going on and fully freaked out and  
9 needed to get out of the office as soon as  
10 possible, but the conversation took place  
11 in two parts in which part of it  
12 happened -- I went back to my desk to  
13 continue doing work and then I was like  
14 called back in, and so I was in this loop  
15 of talking to him and trying to work and  
16 like texting my friend, and it really -- I  
17 wish I had a more linear description of  
18 this conversation, but I -- it's almost  
19 impossible to know how he even jumped from  
20 question to question.

21 I don't know if I'm explaining  
22 this well.

23 Q. How did you feel at the time?

24 A. I felt really uncomfortable, but  
25 I was very sensitive to the fact that I

1 C. Bennett

2 was -- I was scared and I was  
3 uncomfortable, but I also was acutely  
4 aware that I did not want him to get mad.  
5 I know him, I've seen his temper, I've  
6 heard it, I've worked with him for a year  
7 now, and I was trying my best to get  
8 through the conversation, and I was really  
9 like focused almost just on the question  
10 he was asking me, because I was --  
11 otherwise I would have been like really  
12 freaking out. But I was really like very  
13 low energy and a little bit like almost  
14 glum, because he mentioned it the next day  
15 that I was very low energy in this  
16 conversation and asked me why.

17 Q. We'll get to the next day in a  
18 minute.

19 After the conversation with the  
20 Governor, did you speak to anyone in the  
21 office about the conversation?

22 A. I didn't have much work, but the  
23 conversation went on for a significant  
24 period of time. So when I exited the  
25 conversation in the office with the

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1  
2 Governor, I walked by Stephanie's desk,  
3 and she was at her computer, did not turn  
4 around, and said something to the effect  
5 of what were you doing back there so long  
6 or were you working the whole time or what  
7 were you talking about. It was some  
8 question of what was that. And I like  
9 turned to face her, but she never even  
10 turned around to look at me, she was still  
11 facing her computer, and I just said he  
12 asked me questions about the protests and  
13 the press conferences, and she just didn't  
14 reply, and I walked away. At that point I  
15 was extremely freaked out and I am on the  
16 verge of tears, and I walked back across  
17 the hall to where the EAs, where our desks  
18 are, and Executive Assistant #2 sees me and I'm visibly  
19 upset at this point. And she asked me  
20 what was wrong and I just said like I  
21 think Stephanie is mad at me, and that was  
22 really -- she's like -- she like didn't  
23 really understand what was happening, but  
24 I just didn't want to elaborate. I think  
25 I may have said he was chatty or



1 C. Bennett

2 something, but I really didn't go into it.  
3 And I like ordered lunch and never got to  
4 eat it, so I'm like trying to eat this  
5 sandwich but I'm trying also not to cry  
6 and I'm like texting my friend.

7 The interaction with Executive Assistant #2 was  
8 very memorable because I felt like I don't  
9 act like that in the office and things  
10 don't rattle me quite -- like Stephanie  
11 could be mad at me and I wouldn't be  
12 crying, you know.

13 Q. Did anyone else see you in the  
14 office being upset that afternoon?

15 A. Not that I can remember.

16 Q. And you mentioned you were  
17 texting with your friend.

18 Was that your friend [REDACTED] ?

19 A. Yes.

20 Q. And why don't you turn to tab  
21 twenty-three.

22 And is this the texting that you  
23 were doing with her that day?

24 A. Yes.

25 Q. And on the first page, you

1 C. Bennett

2 talked about you were going to burst into  
3 tears, this world is a horrible place, and  
4 then you wrote, "why is everyone racist."

5 What is that a reference to?

6 A. I tried to talk to him about  
7 Black Lives Matter. At the time, I was,  
8 as was the world, very upset and I was  
9 actively frustrated with his response and  
10 he asked me about it in this interaction  
11 and I told him he should show up at a  
12 protest and his comments were confirmation  
13 to me that he didn't really understand the  
14 issue or care enough about it. It was  
15 upsetting on top of everything else.

16 Q. On the next page she writes,  
17 "oh, fuck, are you okay," and you wrote,  
18 "I feel like think of what you think it  
19 could be."

20 What were you referring to  
21 there?

22 A. I was trying to be cryptic but  
23 really was saying nonsense. I would say  
24 that [REDACTED] really didn't like my job,  
25 though I don't know what she would be

1 C. Bennett

2 guessing this would be about.

3 Q. And on the next page you wrote,  
4 "talked about age difference in  
5 relationships" and then "no, but it was  
6 like the most explicit it could be" and  
7 she wrote a series of "oh, my Gods," and  
8 like him, him, the him, and you wrote,  
9 "him, him, him."

10 That was a reference to the  
11 Governor?

12 A. Correct.

13 Q. And on the next page you wrote,  
14 "yes, like shaking."

15 Were you shaking after the  
16 encounter?

17 A. Yes.

18 Q. On the next page you say, "I'm  
19 going to take tomorrow off."

20 That was the Saturday?

21 A. Correct.

22 Q. And then if you turn to the page  
23 further on at Friday, June 5 at 5:13 p.m.,  
24 you wrote, "sorry, still fucking here. So  
25 upset."

1 C. Bennett

2 Were you still stuck at work at  
3 that point?

4 A. I was still stuck at work at  
5 that point.

6 Q. And then if you continue on, you  
7 continued the text Saturday morning. You  
8 wrote, "was in a coma sleep and then I got  
9 a need these six briefings in sixty  
10 minutes. So deeply upset. Ran to the  
11 office."

12 Was that the next time you saw  
13 the Governor?

14 A. Yes.

15 Q. So why don't you tell us about  
16 what happened in that conversation -- in  
17 that encounter.

18 A. I really didn't plan to be in  
19 the office and I didn't really didn't plan  
20 to be alone with him again, and I  
21 literally went to bed, woke up, and then I  
22 was back in the office alone with him  
23 again. And this was, you know, one of  
24 those you just get a horrible e-mail.

25 And I run to the office and I'm

1 C. Bennett

2 like, all right, I can just fix up these  
3 briefings, print them out, drop them, and  
4 I can get out of there. And then  
5 Stephanie walks into the room and she sees  
6 me and she goes oh, good, you're here.  
7 And I swear to God, my heart dropped.  
8 Thinking back I was like I should have  
9 picked a different office, even just like  
10 a different computer to do my same work  
11 just so like I wasn't seen.

12 Anyway, that's irrelevant.

13 She was like, oh, good, you're  
14 here, which means -- I almost knew in the  
15 moment she's going to ask me to go back  
16 there again, and she did. She was like  
17 okay, can you come back. And it was just  
18 me this time. And it was Saturday  
19 afternoon, so there weren't that many  
20 people around. I'm back there. It's  
21 behind the trooper manned door. I'm  
22 sitting at one of the EA desks, so I don't  
23 see the Governor. He is back in his  
24 office. Stephanie is in her office,  
25 Melissa's in her office, so it's just the

1 C. Bennett

2 two of us behind this door. And I'm  
3 sitting there, sitting there, and then  
4 they tell Executive Assistant #2 that she can go or there  
5 was something where like Executive Assistant #2 came to  
6 the door and handed me like my bag and my  
7 purse and stuff, because I was just like  
8 I'm camping out back here.

9 And then Stephanie and Melissa  
10 leave and go to the Governor's pool, and I  
11 was -- I realized in that moment that I'm  
12 baby-sitting him this afternoon and he's  
13 just in his office. I didn't know what he  
14 was doing, and I hadn't seen him, but I  
15 had this moment of like I'm fully alone  
16 with him, there's like barely anyone here,  
17 there's no one behind this locked door  
18 besides the two of us, and my whole plan  
19 was basically to never see him again,  
20 though I had not enacted any plan because  
21 I was asleep between the two interactions.  
22 That was when I think it really like hit  
23 me the graph tee of the situation that I  
24 was in and I really don't have any control  
25 over my life or my location and that this

1 C. Bennett

2 was a lot more serious and a lot more out  
3 of control, a lot more out of my control.  
4 And that's when I start texting [REDACTED] that  
5 I'm outside his door and freaking out.

6 He calls me back at one point to  
7 help him with his phone. There were two  
8 times he called me back, and I don't  
9 remember the order. In one he -- it might  
10 be here. But in one he was trying to get  
11 from app to app and couldn't navigate his  
12 iPhone, so I just showed him how to switch  
13 apps. And in a second instance he thought  
14 his phone was dying and it's plugged in,  
15 fully charged, and he's asking me why it's  
16 dying and I said it's fully charged, it's  
17 a full battery with a charge symbol. What  
18 I realized at the time was that he was  
19 dictating into his notes app the book that  
20 he was writing and just like didn't know  
21 how to work his phone. But I was sitting  
22 there that afternoon babysitting him  
23 helping with his phone while he's sitting  
24 in his office so he can write his book.  
25 And also that like each time I have to

1 C. Bennett

2 walk behind his desk to help him with his  
3 phone, it's like not a thing I've had to  
4 do before because I like never see him use  
5 his iPhone, it was like a first for me.  
6 I'm fully aware that I'm walking behind  
7 his desk and that like closing space.  
8 Like I was closer to him in this  
9 interaction than I was even the day before  
10 because I was like at least just sitting  
11 on the other side of his desk where he'd  
12 have to get up and walk towards me. In  
13 this, I was literally like standing over  
14 him.

15 And then I just -- at one point  
16 he was like thanks, that's it, and I was  
17 like I can go, this is all you need, and  
18 he was like no, I meant like just go sit  
19 back down. I was like I'm going to get  
20 out of here and he was like no, please sit  
21 back down, like I'm not done.

22 And then finally, I'm still  
23 freaking out and sitting at this EA desk,  
24 he calls me back a third time and he's  
25 packing up, and it was like clearly like



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2 the end of the day and he's closing out  
3 and he's like, did you find me a  
4 girlfriend yet, referencing the previous  
5 conversation about trying to find a  
6 girlfriend in the Albany area and I was  
7 like nope, not yet. And I don't remember  
8 what he said. I was wearing jean shorts,  
9 but like very like long and baggy and like  
10 nothing inappropriate, like I felt  
11 comfortable enough. Though I wouldn't  
12 choose to wear jean shorts in front of the  
13 Governor, I didn't feel like I was dressed  
14 like -- I'm not dressed like I'm at a  
15 beach party or anything like that, very  
16 appropriate jean shorts and he tells me I  
17 look like Daisy Duke. And I think I even  
18 admitted that I didn't know who that was.

19 And then he left, and I just --  
20 like I think it was just -- it was almost  
21 scarier than the day before, because it  
22 was just a reminder of again the lack of  
23 control that I had and the fact that like  
24 I promised myself I wasn't going to be  
25 alone with this person and I immediately

1 C. Bennett

2 was and I had nothing -- nothing I could  
3 do.

4 I don't know, it may have been  
5 Jill. I'm not sure. Usually it's Jill,  
6 Annabel, or Stephanie that needs the  
7 briefing, but I couldn't say for sure.

8 MR. KIM: I just asked who had  
9 called her in that Saturday morning.

10 MS. CLARK: Were you going to ask  
11 another question?

12 MR. KIM: Was that how they  
13 normally called you in? Or how did  
14 they normally call you in, by a PIN or  
15 a text message, or how did they do it?

16 THE WITNESS: At that point  
17 everyone else had -- we were using  
18 iPhones, so I was no longer receiving  
19 PINs by the pandemic. I believe it  
20 was an e-mail. But I could get a text  
21 from Annabel. But traditionally it  
22 would be an e-mail.

23 MR. KIM: Thank you.

24 Q. Anything else you recall that he  
25 said in that conversation on the sixth?

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2 A. That he commented on my low  
3 energy from the previous day and asked me  
4 if it was because I was hungover, because  
5 he actually asked me what I had done the  
6 night before and I said I went to bed at  
7 7:30, and then that was like he was oh,  
8 you were low energy, you must have been  
9 hungover, or something to that effect.

10 Q. In your text with [REDACTED], and  
11 it's hard to direct but because it's not  
12 paginated, but at one point on the sixth  
13 you text to her, "I need to talk to Jill"  
14 and then in all caps "immediately."

15 Is that a reference to Jill  
16 Desrosiers?

17 A. Yes.

18 Q. And is that the first time you  
19 considered going to Jill?

20 A. Yes.

21 Q. And why did you think Jill was  
22 the appropriate person to go to?

23 A. I trusted Jill. She was my  
24 boss, and Annabel was also my boss, but I  
25 had no trust, fate, or rapport with her.

1 C. Bennett

2 But Jill -- at that point I really trusted  
3 Jill, and she was a serious person.

4 Q. And we'll come to your  
5 conversations with Jill in a minute.

6 On the next page you texted to  
7 [REDACTED], "I had a second round interview  
8 this week, and they loved me, so there's a  
9 chance."

10 Who did you have the interview  
11 with?

12 A. I think it was the Council of  
13 State Governments. I just maybe made that  
14 up. It was -- it was an organization that  
15 did prison reform.

16 Q. And a little further down you  
17 write, "I've been waiting for almost two  
18 hours." She wrote, "he's not stupid, he  
19 knows what he's doing." You wrote, "he  
20 knows" in all caps. She wrote, "he's so  
21 fucking manipulative and now it's like so  
22 blatant." And you wrote, "this is  
23 definitely what he did to Senior Staffer #3."

24 Is that a reference to Senior Staffer #3  
25 [REDACTED] ?

1 C. Bennett

2 A. Yes.

3 Q. And what were you referring to  
4 when you said, "this is what he did to  
5 Senior Staffer #3 ? "

6 A. I just had this moment of  
7 clarity in which the possibility and  
8 realistic -- like the realistic  
9 possibility that they had a relationship  
10 and how it may have started, and in some  
11 ways I like pitied her in that moment  
12 because she started in the administration,  
13 that was like her first job was with New  
14 York State and thinking that like someone  
15 younger or less confident or a different  
16 person would be sitting there with a  
17 different mindset or somehow encounter  
18 this same man and think that it's  
19 exciting.

20 Q. You talked about the time where  
21 the Governor called you bun for a while.

22 Did the Governor have any other  
23 nicknames for you at any point in time?

24 A. So one thing I did forget to  
25 mention is that he also, in the June 5

1 C. Bennett

2 conversation, he complimented my makeup  
3 and he said he liked my eyeliner and I  
4 think I called them wings, because that's  
5 what they're called, and a few days after  
6 that conversation he called me Wings. I  
7 think it was that Monday following.

8 Those are the only two -- he  
9 called me Lot was the main nickname that  
10 he used.

11 Q. Did he ever refer to you as Miss  
12 Char-A-Latte?

13 A. Yes.

14 Q. How many times did he do that?

15 A. I'm not sure a number.

16 Q. And do you recall the context in  
17 which he did it?

18 A. No, I do not.

19 Q. Did you ever have your picture  
20 taken with the Governor?

21 A. Yes.

22 Q. And when you did, where did he  
23 place his hands?

24 A. Around my waist.

25 Q. And was it the middle of your

1 C. Bennett

2 waist, high, low?

3 A. I don't remember.

4 Q. Did where he placed his hands  
5 during any photos ever make you  
6 uncomfortable, or did you think it was  
7 inappropriate where he placed his hand?

8 A. Looking back, yes, definitely  
9 uncomfortable. Those photos make me  
10 extremely uncomfortable. But again, I  
11 think I was focused on seeing him as more  
12 of a father figure mentor that in the  
13 moment it was not something I picked up  
14 on.

15 Q. Did the Governor ever give you  
16 any copies of photos that had been taken  
17 of the two of you together?

18 A. No.

19 Q. Did you ever send the Governor  
20 pictures of yourself?

21 A. No.

22 Q. Did the Governor ever ask to see  
23 your Instagram account?

24 A. No.

25 Q. Did you ever show the Governor

1 C. Bennett

2 your Instagram account?

3 A. No.

4 Q. Did you ever engage in any  
5 conduct with the Governor that you would  
6 consider to be flirting?

7 A. No.

8 Q. And we're asking some questions  
9 because we don't know what the Governor is  
10 going to say.

11 Did you ever have a romantic or  
12 sexual relationship with the Governor?

13 A. No.

14 Q. Other than what you've already  
15 described, are there any people who worked  
16 in the Chambers or former employees of the  
17 Chambers that you told about the  
18 Governor's conduct when it was happening?

19 A. I told -- so Jill Desrosiers,  
20 Judith Mogul, Staffer #2 [REDACTED], [REDACTED],  
21 Staffer #3 [REDACTED], [REDACTED], [REDACTED],  
22 [REDACTED]. There may  
23 be others.

24 Q. And [REDACTED], did you tell  
25 her after you started working with her?



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2 A. Yes.

3 Q. And [REDACTED], what, if  
4 anything, did he say in response?

5 A. He was upset to hear it. I  
6 don't remember exactly what he said in  
7 response. I think we had a longer  
8 conversation. I saw Lindsey's tweets in  
9 December and had reached out to [REDACTED],  
10 because I didn't know Lindsey. And I had  
11 actually reached out to Lindsey, but  
12 separately from that I kind of wanted to  
13 know from my friends what Lindsey's  
14 rapport error was generally, just for my  
15 own peace of mind, and he was one of the  
16 people I reached out to.

17 Q. And what did he tell you about  
18 Lindsey?

19 A. He said he believed what she was  
20 saying, and I don't even remember what  
21 else he said. I think we talked a little  
22 bit about the political implications of me  
23 involving myself with her. He suggested  
24 that -- and I don't remember the order of  
25 this, but we had talked at that time about

1 C. Bennett

2 me coming out with my story and that I was  
3 like kind toying with the idea but like  
4 ultimately did not want to do it and was  
5 still very raw from this. It was in  
6 December and I had officially left in  
7 November. And this may have even been the  
8 first time I found out about the fact  
9 that's why I left. I'm not sure even when  
10 I told him.

11 But he said -- he's like,  
12 listen, don't even make a decision, just  
13 write it down. I didn't down what you  
14 remember, write down who knows, like put  
15 it somewhere and think about it, you don't  
16 have to make a decision, and we kind of  
17 had that conversation.

18 Q. Other than the conduct you  
19 described between you and the Governor,  
20 were you aware of the Governor engaging in  
21 any inappropriate conduct that was not of  
22 a sexual nature, not relating to sexual  
23 harassment?

24 A. I was frustrated by the mix of  
25 public and private work. I was

1 C. Bennett

2 unimpressed by the way the off was run in  
3 that respect, and thought it was an  
4 inappropriate overlap of state staffers  
5 and campaign efforts.

6 Q. I think we're leaving that  
7 subject to other folks.

8 If you could turn to tab  
9 twenty-five. It's more of your texts with  
10 Staffer #5 .

11 A. Oh, God. Yeah.

12 Q. Where it looks like you wrote to  
13 him, "you leave for one day and the  
14 Governor drops the N-bomb," and that's in  
15 October of 2019.

16 What was that in reference to?  
17 Or is he saying that to you? It's hard to  
18 tell.

19 A. It's difficult to tell. I think  
20 he said that to me, but I easily could  
21 have texted that to him.

22 I remember texting with him that  
23 day, because I went to [REDACTED] there was a  
24 concert that my brother and I were going  
25 to -- he lives in [REDACTED]. So I went up

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2 there and was working remotely, and he was  
3 on the radio that day. So I obviously  
4 listened. And he said the N-word on the  
5 radio. And also making the case that he  
6 is trying to make this comparison between  
7 Italians and black people and he uses that  
8 word, and just like one of those days  
9 where I was like should I just quit? It's  
10 embarrassing, it's embarrassing for  
11 everyone.

12 Yeah, I remember that day well.

13 Q. Other than on the radio, did you  
14 ever hear the Governor use the N-word?

15 A. No, but I remember being  
16 frustrated with the way he spoke about  
17 black people when we were -- this was when  
18 we were talking about -- I don't know if  
19 it was vaping or if it was some sort of --  
20 what we were doing in the fall. But we  
21 were talking about menthol cigarettes.  
22 Not me, sorry, he was having a meeting  
23 with a bunch of folks, I think Dr. Zucker  
24 was there, and I just heard him ask about  
25 what the blacks thought about menthol

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2 cigarettes, how they would react, and it  
3 felt like he would make those comments  
4 sometimes that is not the way you speak  
5 about black Americans.

6 And it was after this, obviously  
7 before George Floyd, but yeah, just kind  
8 of the -- it was kind of the same way I  
9 wrote off the way he spoke to me in that  
10 January conversation about sexual violence  
11 whereas I feel like you're totally out of  
12 -- like you're living in the 1950s and you  
13 don't know what you're saying, but that  
14 ultimately you can't write it off because  
15 he's the Governor of New York and it's  
16 just inappropriate.

17 Q. Now, we saw on the text to [REDACTED]  
18 that on that Saturday you said, "I have to  
19 talk to Jill immediately."

20 After that Saturday, what  
21 happened between then and when you  
22 actually did speak to Jill Desrosiers?

23 A. What happened between, sorry?

24 Q. Yes.

25 A. I had a very long conversation

1 C. Bennett

2 with Staffer #2 [REDACTED] in which I explained the  
3 contents of my conversation from -- with  
4 the Governor from the fifth and then also  
5 I definitely mentioned the fact that I  
6 found myself behind closed doors with him  
7 on the sixth. And it was very much Staffer #2  
8 sitting there silently as I just kind of  
9 let loose what was a combination of  
10 sadness and anger. And then I got in my  
11 car, it was probably 11:00 at this point,  
12 got in my car and drove back to the city.

13 And then I staffed the Governor  
14 in the city, which is when -- it was very  
15 quick, he came in, did the press  
16 conference, left. But I was sitting in  
17 Stephanie's seat because she didn't fly  
18 down and he referred to me as Wings. That  
19 whole staffing experience I was just like  
20 this is it, just get through this one day,  
21 you'll get back to Albany, you'll get out  
22 of this situation, like this is just kind  
23 of like hold it down, it will be quick,  
24 and it was.

25 And then my next stop was to my

1 C. Bennett

2 parents. I think I spent the rest of that  
3 day in the city and the next day I drove  
4 to my parents' on my way to Albany. That  
5 was Tuesday. I texted them in advance,  
6 said are you guys both around, my dad is  
7 working during the day but obviously he  
8 was remotely at that point because of  
9 COVID, can he step away, he's on Wall  
10 Street, he's a trader, so I feel like  
11 there are times when he just like  
12 literally cannot get up from his desk.  
13 But I just said I need -- will dad be able  
14 to just get up and I'll have this  
15 conversation with both of you kind of  
16 thing.

17 And arrived and waited for them  
18 both to sit down, and then I explained the  
19 Governor asked me about my sex life, he  
20 wanted to know if I slept with older men,  
21 and just kind of gave them the very top  
22 line, and they are both upset. And I just  
23 said like I'm on my way to Albany, I'm  
24 going to go talk to Jill, and I just  
25 needed you to know because I might come





1 C. Bennett

2 be stricken from the record here.

3 MS. CLARK: We can move on.

4 Q. So after you spoke to your aunt,  
5 what happened?

6 MS. KATZ: And that doesn't  
7 exactly deal with my concern, which is  
8 I don't want any arguments of waiver  
9 of privilege, so I'm going to move to  
10 strike that. That shouldn't be in the  
11 record.

12 And Charlotte, I'm going to  
13 direct you not to go into  
14 communications with anybody -- a  
15 lawyer that dictated how you would  
16 proceed.

17 MS. CLARK: We're not seeking to  
18 waive the privilege.

19 MS. KATZ: I understand, of  
20 course, but I think other people who  
21 might have access to this transcript  
22 at some point may see that  
23 differently, so I'd like that to be  
24 stricken from the record so there's no  
25 indication of waiver, because there is

1 C. Bennett

2 none.

3 MS. CLARK: I think you've made  
4 your record clearly.

5 Q. Charlotte, after you spoke to  
6 your aunt, what happened?

7 A. I drove up to Albany and I got  
8 there right at six because Tuesdays at six  
9 was my standing appointment [REDACTED]  
10 [REDACTED]. And I explained to her what  
11 had happened on Friday and that I was  
12 going to go talk to Jill, or just -- I  
13 don't even know how far we had gotten.

14 Yeah, it was like an hour of --  
15 it was like I have nowhere to turn was the  
16 theme of the conversation.

17 Q. And was your Trooper #1 [REDACTED] by  
18 phone?

19 A. Yes.

20 Q. So after [REDACTED] [REDACTED] [REDACTED],  
21 what happened?

22 A. I prepared to talk to Jill the  
23 next day and then it was Wednesday and I  
24 decided I would talk to one more person  
25 about my decision, and so I texted [REDACTED]

1 C. Bennett

2 [REDACTED] just to see if he would discuss --  
3 it was like we should go for a walk and  
4 talk.

5 Q. And what was [REDACTED] [REDACTED]  
6 role at the time?

7 A. He was the deputy director of  
8 [REDACTED] [REDACTED] [REDACTED].

9 Q. Did you take a walk with [REDACTED]?

10 A. I took a walk with [REDACTED]. We  
11 went across the plaza. And I just  
12 explained like the Governor wants to have  
13 sex with me and here are the things that  
14 he said, and now I'm trying to figure out  
15 what to do, and it's at least clear to me  
16 that I can't be in this job anymore. I'm  
17 not showing up to his house, I'm not  
18 waiting for him when he's in the office,  
19 I'm not doing this, so I need to -- this  
20 can't happen again. And he agreed that  
21 Jill was probably my best bet. So I was  
22 like all right, I'm going to talk to Jill,  
23 and so I went and I snagged Jill at the  
24 end of the day and it was a really quick  
25 conversation in which she could tell I was

1 C. Bennett

2 upset when I sat down. We were in her  
3 office and I just top line -- I was like  
4 listen, I love you guys, everything is  
5 fine, but I can no longer serve in my  
6 position, the Governor crossed a line with  
7 me last week, and I can no longer serve in  
8 this position. And she asked me what  
9 happened and I just gave her top line, the  
10 same top line. And she said okay, and  
11 asked me basically if I wanted to move to  
12 an agency or if I wanted to just like a  
13 different job or what. It was a very  
14 quick conversation.

15 Q. When you told Jill, did she seem  
16 surprised?

17 A. She seemed surprised, but  
18 looking back, it was such a short and -- a  
19 short conversation with such a specific  
20 solution that it felt very like  
21 insignificant in the larger operations of  
22 the office maybe.

23 Q. Did she ask you any questions,  
24 like details of what happened between you  
25 and the Governor?

1 C. Bennett

2 A. Nothing past just me shooting  
3 out a few examples of him asking me if I  
4 slept with older men, he said he would  
5 sleep with younger women, that kind of --  
6 I gave very brief rundown, and that was  
7 enough for her to say like okay, well,  
8 that's inappropriate and I'm sorry, and we  
9 kind of had like a -- I don't know, I'm  
10 sorry.

11 Q. She said that's inappropriate  
12 and she said she's sorry?

13 A. Yeah, like in the meeting she  
14 definitely validated the fact that it was  
15 inappropriate behavior.

16 Q. Did she say anything to you  
17 about making any sort of formal complaint?

18 A. No.

19 Q. Did she tell you whether she had  
20 to report it to anyone?

21 A. No.

22 Q. Did she talk to you about  
23 retaliation and you being protected from  
24 retaliation or anything along those lines?

25 A. No.

1 C. Bennett

2 Q. Prior to this conversation, had  
3 you ever spoken to Jill Desrosiers before  
4 about possibly leaving Chambers?

5 A. Yes.

6 Q. When she asked you if you wanted  
7 to work for an agency or go somewhere else  
8 within the structure, what did you tell  
9 her?

10 A. I said I was fine to stay in  
11 Chambers, but I didn't want any  
12 interaction with him.

13 Q. Anything else you recall the two  
14 of you discussed during that meeting?

15 A. I think we discussed my general  
16 interests, like women's health and  
17 possible jobs.

18 Q. How did the meeting end?

19 A. She told me to return on Friday,  
20 so two days.

21 Q. Did you speak to anyone about  
22 that meeting after it happened?

23 A. I told [REDACTED], I told my parents,  
24 I later told Staffer #2 [REDACTED], and I just had  
25 mentioned that night when I told [REDACTED]

1 C. Bennett

2 Staffer #3, Staffer #4, and then  
3 Staffer #2 was there, I mentioned I spoke  
4 to Jill and I got a new job.

5 Q. And just to confirm, is tab  
6 twenty-six texts that you sent to  
7 after you spoke to Jill? It starts with  
8, I'm sorry, a few pages in.

9 A. Yeah.

10 Q. And is tab twenty-seven texts  
11 you had with your parents after the  
12 meeting with Jill?

13 A. This was the conversation --  
14 this was following the conversation when I  
15 followed up with her two days later.

16 Q. Before we get to that, did you  
17 have a follow-up conversation with ?

18 A. I definitely did.

19 Q. And what do you recall you and  
20 discussed after you spoke with Jill?

21 A. I think I just gave him a  
22 rundown.

23 Q. And so you said it was two days  
24 later.

25 Did you follow up with Jill, or

1 C. Bennett

2 did Jill follow up with you?

3 A. I followed up with Jill. I  
4 actually poked my head in her office -- it  
5 was like it's Friday, I just need to know  
6 what's going on because I'm still in this  
7 job, it's been a week doing this, and I  
8 poked my head in and she kind of had that  
9 like almost a moment of like recognition.  
10 And I don't know if she said like come  
11 back later or she couldn't talk right  
12 then, but it was almost like this moment  
13 where she saw my face and she needed to do  
14 what she said she was going to do, which  
15 also makes me think that it wasn't a big  
16 deal because she literally forgot until  
17 she saw me again that we were supposed to  
18 meet and she was supposed to have answers  
19 to the questions that I posed on  
20 Wednesday.

21 Q. And so did you speak with her  
22 later that day?

23 A. I spoke with her later that day,  
24 but I actually ran into [REDACTED] [REDACTED] in  
25 the hallway before I spoke with Jill and



1 C. Bennett

2 [REDACTED] was like I just talked to Jill,  
3 you're going to join my team, I'm so  
4 excited. So then I went into Jill later  
5 towards the end of the day and she was  
6 like you'll be joining the health team.  
7 And then I just said I want to be doing  
8 women's health and LGBTQ health and she is  
9 like, yeah, that and other stuff, and we  
10 kind of talked and I thanked her and was  
11 still probably emotional and I'm sure -- I  
12 think she still just -- she was like being  
13 kind. And then that was like I think a  
14 fairly short conversation as well.

15 Q. And was that your last day  
16 working as an executive assistant?

17 A. Yes.

18 Q. When did you start in the health  
19 role?

20 A. Monday the fifteenth.

21 Q. So the following Monday you  
22 started your new job?

23 A. Yeah.

24 Q. Did you say good-bye to the  
25 other executive assistants?

1 C. Bennett

2 A. I think at one point I went in  
3 there and like told them I was leaving,  
4 but it was very abrupt, and I don't  
5 remember exactly when.

6 Q. Did you tell them why you were  
7 leaving?

8 A. I didn't tell them the actual  
9 reason, and they knew, referring to the  
10 job interviews that I had had outside of  
11 New York State government, they knew that  
12 I was trying to something something  
13 movement professionally, so I tried to --  
14 I don't know exactly what I said, but they  
15 were kind of like oh, congratulations,  
16 because I was like interviewing for other  
17 jobs, so I didn't really address it in an  
18 honest way.

19 Q. Did you tell them whether --  
20 that Jill had anything to do with moving  
21 over to working in the healthcare?

22 A. I probably did because I feel  
23 like Jill would be important in that  
24 decision.

25 Q. And so the following Monday you

1 C. Bennett

2 started healthcare.

3 Where were you physically  
4 located at that point?

5 A. I was located on the other side  
6 of the Capitol in the other hallway. I  
7 just took a desk, like no one was around  
8 because of COVID, so I just like took a  
9 desk close to [REDACTED].

10 And then I don't think [REDACTED]  
11 even -- she didn't know I was starting,  
12 and so Monday we had a meeting and then  
13 she asked me maybe in that afternoon  
14 meeting, she kind of got into work late,  
15 not that she started working late but she  
16 started working first thing in the morning  
17 and then was able to drive her car from  
18 one location to the other in the middle of  
19 the day. We talked later in the day on  
20 Monday and she asked me when I was  
21 starting and I said today is my first day,  
22 and she was like oh, okay.

23 Q. After you switched over to  
24 healthcare, did you ever see the Governor  
25 again?

1 C. Bennett

2 A. I was invited to his pool party,  
3 which is not -- it was more just beverages  
4 and snacks in his pool house. I was not  
5 on the actual like invitation, which was  
6 an e-mail thread. But the day of the  
7 party, like maybe two hours before the  
8 party started, I got a call from Stephanie  
9 inviting me to the party that I didn't  
10 know about until she called me. And I  
11 reasoned that I would have to go to make  
12 it look like everything is fine, and I was  
13 really at that point concerned about  
14 keeping up appearances generally but also  
15 with the Governor, because I at that point  
16 was hoping that he didn't know what  
17 happened and I told Jill in both of these  
18 meetings like I really didn't want him to  
19 know that I had said anything. And I'm  
20 remembering now that on the fifth he also  
21 mentioned again the cone of silence.  
22 That's just an aside. And I just remember  
23 like even the idea of breaking that cone  
24 of silence to me -- like I just wanted  
25 everything to seem fine, so I was like I

1 C. Bennett

2 have to go to this party.

3 And so I texted Staffer #2 [REDACTED] to  
4 be like is this a party, this is a real  
5 thing where people are arriving at his  
6 house and I'm not going to show up and be  
7 there and no one else is going to be  
8 there, and he confirmed that there was an  
9 event.

10 So I showed up at his house at  
11 noon and, when he eventually arrived or  
12 like made his entrance, he like really  
13 didn't acknowledge me and I was like  
14 standing in a line with other -- I don't  
15 know who else. We just like hugged, but  
16 it was bizarre and uncomfortable, and he  
17 like didn't even acknowledge me at all. I  
18 think it was more because there was like  
19 no one to greet a line of people without  
20 pretending to greet me first and then  
21 greet the next person and then greet the  
22 next person.

23 Q. Did Jill or anyone else ever  
24 tell you what, if anything, anyone told  
25 the Governor as to why you disappeared

1 C. Bennett

2 from staffing him?

3 A. On the Friday conversation, the  
4 follow-up conversation with Jill, she  
5 asked me if she could tell Stephanie and  
6 Melissa and I really didn't want her to,  
7 but I understand that she was kind of like  
8 I have to say something, and she said she  
9 would say like that they had an awkward  
10 interaction or something along those  
11 lines. I was like okay, but I really  
12 don't -- just say I really don't want him  
13 to know, I really just want to -- this is,  
14 you know, as little as possible. Like  
15 everything is fine. Like I just -- like  
16 trying to back away as slowly as possible  
17 without rocking the boat and like -- so  
18 when I got the call from Stephanie  
19 inviting me to the party, like it was very  
20 bizarre.

21 Q. After you stopped being an  
22 executive assistant, other than when  
23 Stephanie called you to invite you to the  
24 party, did you have any discussions with  
25 Stephanie?

1 C. Bennett

2 A. We had some e-mail exchanges. I  
3 was still helping the briefing team,  
4 because one of the briefers took vacation  
5 and I was still helping like drop things  
6 off, and they kept putting me on e-mail  
7 chains, so there was some of that.

8 Q. After Jill told you that she was  
9 going to tell Stephanie and Melissa  
10 DeRosa, did you have any conversations  
11 with Melissa DeRosa?

12 A. At the end of the pool party I  
13 was sitting next to her, but she was not  
14 addressing me specifically.

15 I actually e-mailed the two of  
16 them after the pool party ended. I mean,  
17 this is how hard I was trying to make it  
18 seem like everything was totally fine. I  
19 e-mailed Stephanie and Melissa after the  
20 pool party being like you are amazing  
21 women that hold up New York State and I  
22 can't imagine -- like it's such an honor  
23 knowing you. It was like the most kiss  
24 ass e-mail I've ever written in my whole  
25 life and I was just sitting there like

1 C. Bennett

2 feeling disgusting but like really the  
3 most olive branch whatever I could  
4 possibly craft in a single e-mail. And  
5 they both replied the next day like very  
6 kind messages, like, oh, Charlotte, that's  
7 so kind of something bullshit, and then  
8 that was really it.

9 Q. And when's the next time, if  
10 ever, you spoke to anyone in senior staff  
11 about what happened with you and the  
12 Governor?

13 A. After that, I was -- Jill  
14 brought me into her office on June 30 and  
15 told me that I needed to tell Judy Mogul  
16 the entire story from the first day I  
17 started at the Chamber.

18 Q. And what time of day was it on  
19 the thirtieth?

20 A. Right before 6:00, [REDACTED]  
21 [REDACTED] [REDACTED].

22 Q. And when Jill told you you had  
23 to tell Judy Mogul, was that before or  
24 after you went out with the group of  
25 people, [REDACTED] Staffer #4 [REDACTED], [REDACTED] Staffer #3 [REDACTED], et cetera,



1 C. Bennett

2 and told them about your interactions with  
3 the Governor?

4 A. It was the next day that she  
5 called me.

6 Q. So you went to -- it was at her  
7 office?

8 A. Yes.

9 Q. And she said you needed to tell  
10 Judy Mogul, did she tell you why?

11 A. She just said she needed someone  
12 else to understand the events. She didn't  
13 explain too much.

14 Q. Did she tell you why the  
15 conversation was happening on June 30 when  
16 you had last spoken to her on June 12?

17 A. No, she did not.

18 Q. And did you -- was Judy then  
19 brought into the meeting at that point?

20 A. Jill called her on an iPhone and  
21 put her on speakerphone.

22 Q. And how long did your  
23 meeting/call with Jill and Judy last?

24 A. Over an hour, at least.

25 Q. And what do you recall was said

1 C. Bennett

2 by -- by the three of you in that meeting?

3 A. She -- Judy apologized and just  
4 said, you know, I know this is a lot, this  
5 is hard, but you're going to have to  
6 explain as much as you can remember about  
7 your relationship with the Governor,  
8 interactions you had, conversations you  
9 had from the moment you were hired. And I  
10 launched into I started on January 24,  
11 2019 as this title all the way to present  
12 day. And Judy was taking notes and  
13 interjecting with questions. And then at  
14 the end I just said so what's the -- you  
15 know, what's the deal, and like what is  
16 this. And she just said I don't know, I  
17 need some time to look this over.

18 Q. You said she was taking notes.  
19 How do you know she was taking  
20 notes?

21 A. She said she was creating a  
22 chronology, and she would often pause,  
23 refer back to things. I think there may  
24 be a point or two at which she asked me to  
25 slow down.

1 C. Bennett

2 Q. And you said she asked you  
3 questions.

4 Do you recall any of the  
5 questions that she asked you?

6 A. I don't remember specific  
7 questions, but they were mostly clarifying  
8 questions as I shared all the same  
9 information that I've shared with you  
10 today.

11 Q. And did Ms. Mogul or Ms.  
12 Desrosiers say that they were going to  
13 report what you shared to anyone else?

14 A. No.

15 Q. Did she explain the complaint  
16 procedure to you at all?

17 A. No.

18 Q. Did she talk to you about  
19 retaliation or assure you you wouldn't be  
20 retaliated against?

21 A. No.

22 Q. I'm going to ask you to look at  
23 tab twenty-eight.

24 Are these texts -- text exchange  
25 between you and [REDACTED] after you had your

1 C. Bennett

2 meeting with Jill and Judy?

3 A. Yes.

4 Q. And on the first page, the first  
5 thing you wrote was, "toxic positivity."

6 What was that a reference to?

7 A. Her [REDACTED] was teaching her  
8 about toxic positivity as it related to  
9 her relationship with her mother.

10 Q. On the next page you wrote,  
11 "dude, Jill just pulled me into her  
12 office. [REDACTED] said she had never seen  
13 Jill even in the health team's office  
14 before."

15 Is that something that [REDACTED]  
16 [REDACTED] told you?

17 A. Yes.

18 Q. Did you have any conversation  
19 with [REDACTED] [REDACTED] about the meeting you  
20 had with Jill and Judy after you had it?

21 A. I returned to my desk and [REDACTED]  
22 -- after my call with Judy and Jill and  
23 [REDACTED] was still there, so she asked me  
24 what Jill was doing in her office, why she  
25 pulled me out, and what took so long. And

1 C. Bennett

2 I explained that I had a call with Judy,  
3 and that was when I basically said, you  
4 know, I never want to be alone in a room  
5 with the Governor again and that's why I'm  
6 working for you now, and I just had a  
7 whole conversation with Judy about it.

8 Q. And what, if anything, did [REDACTED]  
9 say when you said you had to talk about  
10 all that with Judy?

11 A. She seemed shocked and upset,  
12 but also just reiterated like how excited  
13 she was to work with me. We had worked  
14 obviously together in a different capacity  
15 and she just wanted to make sure I was  
16 okay and said she looked forward to the  
17 team and just kind of was checking in on  
18 me.

19 Q. On the next page you wrote,  
20 after talking with [REDACTED] about talking  
21 with the Chamber, "she was nice and she's  
22 very well-respected and I really  
23 appreciated the way she went about it."

24 Is that a reference to Judy?

25 A. She is, though I don't stand by

1 C. Bennett

2 that statement.

3 Q. Do you stand by any of it or  
4 part of it, or what's your view on that  
5 statement today?

6 A. She was nice and she is very  
7 well-respected in the office. I don't now  
8 appreciate the way she went about it,  
9 mostly because it was just not how she's  
10 legally required to handle this.

11 Q. And you wrote, "and I just said  
12 I will do anything to make it not a  
13 problem."

14 Is that something that you said  
15 to Jill and Judy?

16 A. Yes, several times.

17 Q. Did you -- other than your text  
18 with [REDACTED] and you talked to [REDACTED]  
19 [REDACTED], did you speak to anyone else  
20 about the meeting?

21 A. I probably -- oh, I described it  
22 to [REDACTED] [REDACTED]. He told me I should be  
23 writing everything down and I should find  
24 a lawyer.

25 Q. Anything else that you and [REDACTED]

1 C. Bennett

2 discussed?

3 A. No. He was just concerned  
4 generally.

5 Q. In your meeting, did Judy ask if  
6 the Governor ever touched you?

7 A. I don't remember.

8 Q. Did she ask if the Governor ever  
9 made any sexual advances towards you?

10 A. I don't remember.

11 Q. Did Judy Mogul ever make any  
12 comments along the lines of you took  
13 control before anything could happen?

14 A. The next day she -- I texted her  
15 the next day just being like -- so  
16 backtrack.

17 The next day I get an e-mail  
18 from [REDACTED], and it was just like  
19 you might want this, something along those  
20 lines, and it was a link to the employee  
21 handbook, which I had not yet seen, and I  
22 freaked out. So I texted Judy like what's  
23 going on, like have you made up -- what is  
24 happening; right? Like I'm just what's  
25 going on. And she was like can we get on

1 C. Bennett

2 the phone with Jill.

3 So we get on the phone and she  
4 just said the way you described it as  
5 grooming is actually so accurate and seems  
6 like you really stopped it, like you  
7 really nipped it in the bud, and it didn't  
8 rise to the level of sexual harassment, it  
9 was only grooming, so we don't do anything  
10 about this, and I really think the way you  
11 handled this was -- she complimented the  
12 way I handled it and said that if she had  
13 -- I don't know if she has a daughter, but  
14 she was just like I hope that's how my  
15 daughter would handle this. And I was  
16 like thanks. And she was like it sounds  
17 like you had a friendship, or like she  
18 made some reference to my relationship  
19 with the Governor, and I just tried to  
20 like still backpedal, I was like yep, it  
21 was a friendship, I don't know what  
22 happened, just still trying to soften  
23 everything, because I was still terrified.  
24 And they were just like okay, yeah, yeah,  
25 yeah, and then that was the whole phone



1 C. Bennett

2 call.

3 Q. And am I correct in  
4 understanding, in the first conversation  
5 you had with Jill and Judy, you made  
6 reference to the Governor grooming you and  
7 in the second one she picked up on that  
8 and said, yeah, it was just grooming, or  
9 something along those lines?

10 A. Correct.

11 Q. Did -- in any of those  
12 conversations did Jill or Judy tell you  
13 that there were counseling services  
14 available for you, or an EAP program?

15 A. Not that I can recall.

16 Q. And so am I correct that Judy  
17 said it wasn't sexual harassment so she  
18 didn't have to report it to anyone else,  
19 or something along those lines?

20 A. Yes.

21 Q. Did Judy tell you in the second  
22 conversation that she was very familiar  
23 with the handbook?

24 A. Yes.

25 Q. Did she tell you that she was

1 C. Bennett

2 very familiar with the law in this area?

3 A. Yes.

4 Q. And did she tell you -- is that  
5 when she said that it was not sexual  
6 harassment because you stopped it before  
7 it got to that point, or words to that  
8 effect?

9 A. Yes.

10 Q. Did she ask if you agreed with  
11 that, that you had stopped it before it  
12 crossed into sexual harassment?

13 A. Yes. I basically just agreed  
14 with whatever. I was really, really  
15 trying my best to show them that I wasn't  
16 a threat of my kind, to the point of where  
17 even [REDACTED] had you just told them the  
18 whole story, like begin to end, and I was  
19 like I really am -- like I'm really trying  
20 to put all my cards on the table, I'm not  
21 trying to like -- I'm trying to be the  
22 least adversarial I can ever be, like  
23 thanks, everyone, for all your hard work.  
24 I don't know, I just really -- I was just  
25 trying to be the most agreeable, least

1 C. Bennett

2 rocking the boat I could possibly be.

3 Q. In the July 1 conversation, did  
4 Jill or Judy tell you that filing your  
5 complaint was an option for you?

6 A. No.

7 Q. Did either of them tell you  
8 that, if you wanted to bring any sort of  
9 complaint, that you'd be protected from  
10 retaliation?

11 A. No.

12 Q. Did Judy tell you that she  
13 thought you were very courageous?

14 A. Yes.

15 Q. Did they ask you any questions  
16 about your new job?

17 A. Yes, they did.

18 Q. What did they ask you about your  
19 new job?

20 A. They asked if I was happy about  
21 it.

22 Q. And anything else you recall  
23 that was said in the July 1 follow-up?

24 A. I think I described it as a  
25 dream job.

1 C. Bennett

2 MR. KIM: Can I ask a follow-up  
3 question? Can you hear me on the  
4 video?

5 MS. CLARK: Yes.

6 MR. KIM: You mentioned earlier  
7 that you were sort of terrified.

8 What were you terrified --  
9 during that call, what were you  
10 terrified of?

11 THE WITNESS: I didn't think any  
12 person I had talked to at any point,  
13 as nice as they were, were going to  
14 protect me from anything at all at any  
15 point.

16 MR. KIM: And were you afraid of  
17 the Governor at that time?

18 THE WITNESS: Yes.

19 MR. KIM: And what about -- what  
20 made you afraid of the Governor? What  
21 were you afraid he might do, or what  
22 might happen if he knew about it?

23 THE WITNESS: Well, I certainly  
24 expected to lose my job, and that was  
25 a real possibility is what I told my

1 C. Bennett

2 parents. I was scared to even see him  
3 in the hallway, which was a rare  
4 occurrence anyway. I was honestly --  
5 I was just terrified. I don't even --  
6 I feel like I sat next to senior staff  
7 as they worked and I have no concept  
8 of how far they'd go to protect him  
9 and didn't want to find out.

10 MR. KIM: And are you afraid of  
11 him today as well, or what he might  
12 do?

13 THE WITNESS: Yeah.

14 Q. Other than what you've already  
15 described, did you have any other  
16 conversations around this time with [REDACTED]  
17 [REDACTED] about your conversations or the  
18 complaint procedure or what you might do?

19 A. I don't remember particulars,  
20 just that he was concerned about my  
21 approach and really thought I needed a  
22 lawyer.

23 Q. And [REDACTED] sent you the employee  
24 handbook, and that was the first time you  
25 had seen it?

1 C. Bennett

2 A. Correct.

3 Q. Did he just send it to you or  
4 did you ask him for it, or how did that  
5 come about?

6 A. He later told me that Judy asked  
7 him that day to find the handbook.

8 Q. So after he found it, he sent it  
9 not just to Judy but to you?

10 A. Correct, because he already knew  
11 at that point the conversation I had had  
12 with Judy, so he was aware of the context  
13 in which she was asking.

14 Q. So your understanding was that  
15 Judy asked for the handbook between your  
16 June 30 and July 1 conversations?

17 A. Correct, and happened to ask one  
18 of the few people who knew exactly the  
19 conversation she had had with me the night  
20 before.

21 Q. After July 1, during that  
22 summer, did you continue to work in the  
23 healthcare group? Sorry, you had moved in  
24 June, and so then you were working with  
25 [REDACTED] [REDACTED] during the summer; is that

1 C. Bennett

2 correct?

3 A. Correct.

4 Q. Just in general terms, what sort  
5 of work were you doing?

6 A. I was really trying to get a  
7 grip on where I could be useful and was  
8 doing a lot of, you know, introductory,  
9 like this is Charlotte, this is what she's  
10 going to be working on, Charlotte meet  
11 this team, they do X, Y and Z, a lot of  
12 those intro calls within different  
13 agencies within the department. But I  
14 ultimately didn't really have much work  
15 and didn't really do much at all.

16 Q. And did you report to [REDACTED]  
17 [REDACTED] the whole time you were in the  
18 healthcare group after that?

19 A. She found out the first week or  
20 so of July that she was being pushed out  
21 of her position, and then she cancelled  
22 everything on her calendar and she was  
23 very hard to get in touch with, which I  
24 don't blame her for at all, I feel like  
25 that was a normal response to what she was

1 C. Bennett

2 dealing with at that time, but it left me  
3 with no guidance and no direction and any  
4 kind of day-to-day format we were creating  
5 as a team fell apart, and then I really  
6 didn't have much to do. So that -- the  
7 work with [REDACTED] really lasted the  
8 fifteenth through the first week of July.

9 Q. And after that, did you do work  
10 with anyone else in the department?

11 A. I tried. I worked with [REDACTED]  
12 [REDACTED], who was [REDACTED] right hand. I  
13 worked with -- I tried to talk to people.  
14 At one point I even went over to DOH and  
15 had some meetings. Her replacement  
16 started, so I had like two new bosses and  
17 I had meetings with them, and I really was  
18 like trying to -- trying to work through  
19 the emotional state that I was in. I was  
20 not in a good place. I was anxious and  
21 felt really isolated. I was like paranoid  
22 to a certain extent about my proximity to  
23 certain people and who knew what and I was  
24 lying to people, I was telling some people  
25 the truth, I didn't know who to trust, and



1 C. Bennett

2 I had no idea what was going on, no one  
3 explaining to me like the work and, when  
4 they were, it was like I had no space in  
5 it because no one had had my job  
6 previously, so I'm supposed to carve my  
7 own way with two new bosses who also have  
8 never worked in state government and they  
9 didn't know what was going on either. It  
10 was the most depressing, chaotic -- there  
11 are two issues. My struggle to realize  
12 and like come to terms with what happened  
13 with my job and then also just the  
14 external -- the Department of Health as  
15 being like carved from the inside out,  
16 everyone's leaving, people are retiring,  
17 you know, the dynamics of the Executive  
18 Chamber's relationship with the Department  
19 of Health has its own issue, so I was  
20 stuck in both.

21 Q. Who were the two replacements  
22 for [REDACTED] [REDACTED] ?

23 A. [REDACTED] [REDACTED] and [REDACTED]  
24 [REDACTED] .

25 Q. And you said starting early July

1 C. Bennett

2 [REDACTED] sort of cleared her calendar.

3 Did you have any further contact  
4 with her after that?

5 A. I did, and we talked about the  
6 new hires, we talked about ways I could  
7 get back, you know, find my like niche in  
8 the team. We talked about leaving and how  
9 she was going to help me get another job,  
10 either in the Chamber or outside the  
11 Chamber. I really -- I think we had  
12 several different conversations about like  
13 where am I going to go to.

14 Q. In the fall of 2020, did [REDACTED]  
15 have any conversations with you about  
16 anything that needed to be kept  
17 confidential?

18 A. Can you repeat that?

19 Q. Sure.

20 During the fall of 2020, did  
21 [REDACTED] at any point reach out to you to  
22 talk about something and say it was  
23 something that needs to be kept  
24 confidential?

25 A. Not that I can remember. It was

1 C. Bennett

2 mostly me looking for professional and  
3 personal help.

4 But are you referring to  
5 something in particular or --

6 Q. I'm not.

7 A. Okay.

8 Q. And did [REDACTED] and [REDACTED]  
9 remain [REDACTED] replacement throughout the  
10 rest of the time that you were there?

11 A. I took [REDACTED] leave beginning  
12 of September, returned the end of  
13 September, and when I went -- I returned  
14 simply to quit, and upon quitting to  
15 [REDACTED], she quit to me -- [REDACTED] quit  
16 as I was quitting and we kind of laughed  
17 and I was like yeah, I'm going to kind of  
18 like leave the state for a while and she  
19 was like I'm going to spend more time with  
20 my family. And then I heard after the  
21 fact that there were a lot of problems  
22 with the Governor as it related to her and  
23 [REDACTED] and that he kind of let his temper  
24 loose, which was also like him expecting  
25 two new hires who have never worked in

1 C. Bennett

2 government to fix the Department of Health  
3 within a few weeks, you know, one of those  
4 things beyond the realm of physics.

5 And then I like -- that was my  
6 first quit upon returning to [REDACTED], and  
7 then the rest of the quits, which are to  
8 like [REDACTED] [REDACTED], Jill Desrosiers took  
9 several weeks.

10 Q. Why did you decide to quit upon  
11 your return from [REDACTED] leave?

12 A. I figured out pretty quickly  
13 into [REDACTED] leave that like I was  
14 miserable and suffering and my [REDACTED] was  
15 worse. I was -- I lost my confidence, I  
16 was teary, I was anxious, I think  
17 [REDACTED] [REDACTED] [REDACTED], which that's  
18 like -- I had my first good night's sleep  
19 of my adult life in September of 2020.

20 And I just -- like that fact  
21 alone is that I did all of 2019 and the  
22 first majority of 2020 without actually  
23 sleeping, that [REDACTED] [REDACTED] [REDACTED]  
24 [REDACTED] [REDACTED] and been dealing with this  
25 bullshit is just like not the thing that I

1 C. Bennett

2 needed to hear because I was already like  
3 anxious and like traumatized and didn't  
4 really even had a job, just like had a job  
5 title. If I turned my phone off, who  
6 would have noticed. That's kind of how it  
7 felt. Like this isn't even worth it.

8 And to be honest, I hated the  
9 fact like everything had to be about the  
10 Governor, which I know is what happens  
11 when you work in the Executive Chamber and  
12 also just in New York State government,  
13 but I just like -- I had no interest. Not  
14 only did I have no confidence but I had no  
15 interest in expending any energy as it  
16 related to him. Not that I could because  
17 I didn't have a job, like a real job.

18 Yeah, I was just angry and sad  
19 and really needed to extract myself from  
20 that.

21 Q. You said it took several weeks  
22 before you could quit to Jill Desrosiers.

23 Why did it take a few weeks?

24 A. She's really hard to get as in  
25 -- I refused to go to Albany. I knew he

1 C. Bennett

2 was up there and I was not going to do it,  
3 so every time she came to the city I would  
4 like try and coordinate seeing her with  
5 her assistant, and it was always like  
6 she's busy or she was about to be free or  
7 he was like oh, the mood just shifted, you  
8 don't want to talk to her right now. It  
9 was like impossible to get to her. And I  
10 don't think she realized that I was trying  
11 so hard to meet with her.

12 Q. And when did you finally have a  
13 chance to talk to her about quitting?

14 A. I was sitting in my apartment  
15 working on my grad school applications,  
16 because at that point I wasn't working. I  
17 was just trying to quit and waiting.

18 And I get a call on my work  
19 phone, so I answer it, and it was Judy and  
20 she said we -- Jill and I both heard a  
21 rumor that you're quitting, what is this,  
22 is this true, what's going on. And I  
23 immediately got emotional, because I  
24 didn't know that I was about to pick up  
25 the phone and talk to Judy Mogul. And she

1 C. Bennett

2 kind of apologized and so was like you  
3 don't sound great and I was like yeah, I  
4 am quitting. And she was like, well,  
5 where are you going. I was like I'm not  
6 going anywhere, I'm going to school, like.  
7 And she was like, well, when, you know,  
8 like you're going to be -- like we can  
9 find you a job until you go to school.  
10 And I was just like I'm looking at January  
11 terms, you know, it's October, like it's  
12 fine. And she was like if you wanted  
13 another job, just -- you should think of  
14 that, and I kind of gave her like an okay,  
15 I'll think about it, I haven't really  
16 thought about it. But at that point I was  
17 more just like -- not that she was  
18 pressuring me, but I was like yeah, maybe,  
19 yeah, I'll put that on my list of things  
20 to think about. But I was pretty  
21 emotional. And she asked me what was  
22 wrong and I explained that I had been  
23 [REDACTED] [REDACTED] [REDACTED] but also that,  
24 because she asked, does it have to do with  
25 the conversations we had previously about

1 C. Bennett

2 the Governor and I said yes. And she was  
3 like I'll let you go, but you sound  
4 [REDACTED], like how can we help you and  
5 like I'm concerned, like we can support  
6 you. I felt very ambushed and I was  
7 pretty emotional and freaked out. But I  
8 did explain that I had been trying to meet  
9 with Jill, I had been trying to quit for  
10 some time.

11 Q. Did you have any understanding  
12 as to what Judy meant by saying that they  
13 could support you?

14 A. I understood that as finding me  
15 a job to take until I started a program, a  
16 school program.

17 Q. Did she mention any specific  
18 type of job?

19 A. No. She said I should think of  
20 something that I want and then let them  
21 know.

22 Q. If you could look at tab thirty,  
23 some more texts between you and [REDACTED], it  
24 looks like.

25 Is this after you had your



1 C. Bennett

2 conversation with Judy?

3 A. Yes.

4 Q. And a few pages in you wrote --  
5 she writes, "they just must be terrified  
6 that you're going to talk" and then in  
7 response to some other stuff you write, "I  
8 literally will talk. Give me \$300,000  
9 now. Exactly. That's what I tried to say  
10 but I was just so caught off guard."

11 What were you talking about  
12 there?

13 A. So the I literally will talk,  
14 give me \$300,000 now is a joke, because  
15 part of my fear of meeting was that they  
16 would ask me to sign something and I was  
17 going back and forth with my partner, with  
18 [REDACTED], I was like are they going to  
19 make me sign an NDA and it was this kind  
20 of ongoing -- it was like a real thing I  
21 thought they were going to pull, and that  
22 I was mad and I will share my story and I  
23 am. Obviously I wasn't actually expecting  
24 \$300,000. It was a very off-color joke.

25 And then the "exactly that's

1 C. Bennett

2 what I tried to say" was about her last  
3 paragraph. "The whole thing isn't about  
4 them. Even though they've been horrible,  
5 it's fundamentally about you and what you  
6 need to do on every level." That was what  
7 I tried to say; I was like I need to go.

8 Q. And did you ever speak to Jill?

9 A. I did end up meeting with Jill  
10 and we -- it was very much, you know, what  
11 are we going to go do and I just said I  
12 have paid time off, so she was like, well,  
13 okay, start your paid time off on Monday,  
14 which basically just means I ride out the  
15 rest of my PTO. And she asked again about  
16 the jobs. She mentioned that there was a  
17 program that they might start that had to  
18 do with public health that I could be  
19 interested in. She was kind and she kind  
20 of said like so what happened and I tried  
21 to touch on both the team fell apart, like  
22 this wasn't a real job, and also that like  
23 I was impacted by the sexual harassment.

24 I didn't say the word "sexual  
25 harassment," but when I started talking

1 C. Bennett

2 about what happened with the Governor, she  
3 kind of cut me off and then restated like  
4 oh, I'm so sorry what happened with the  
5 team. Which was just like kind of almost  
6 I felt like she was rewriting history as  
7 the conversation was happening. But at  
8 that point I still am just like yep, I  
9 have to go. And she was like, listen, I  
10 understand, it's been a hard year for  
11 everyone, and we're all kind of  
12 traumatized and if you need to get out of  
13 here, take your space, but we're always  
14 here. And if you ever -- like if you  
15 decide that you do want something, just  
16 let us know.

17 And then I just said thank you,  
18 and left.

19 Q. Did you tell Jill how upset or  
20 affected you were by your interactions  
21 with the Governor?

22 A. Yeah, I said, you know, I'm just  
23 -- like I've been really anxious, at this  
24 lost confidence, and that's when she kind  
25 of redirected to like I'm sorry the team

1 C. Bennett

2 didn't work out. And I really didn't want  
3 to push it with her, but I did make a  
4 point to say like I want to get away from  
5 him.

6 Q. Did you tell Jill that you had  
7 gotten [REDACTED] [REDACTED]?

8 A. Yes, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. Anything else you recall in your  
10 discussion with Jill?

11 A. I think I just told her that I  
12 really look up to her and it was sad. I  
13 think I was just sad. Like I felt very  
14 much like thank you, you know, I  
15 appreciate whatever. I don't know. Just  
16 tried to leave it as like I respect you, I  
17 appreciate you. I said I didn't want to  
18 disappoint her.

19 MR. KIM: Did she say anything in  
20 response to your comment you wanted to  
21 get away from the Governor?

22 THE WITNESS: She just kind of  
23 agreed.

24 MR. KIM: How did she agree?

25 THE WITNESS: I think she just

1 C. Bennett

2 said yeah, that makes sense. We've  
3 had a hard year. I think he was  
4 really abusive to her through COVID.  
5 I think it had to do with her  
6 departure that we had never discussed  
7 the two of us but that I had heard  
8 rumors about. But I don't think she  
9 was particularly pleased with him  
10 either.

11 MR. KIM: What rumors had you  
12 heard?

13 THE WITNESS: There were times  
14 when she wasn't allowed into the back  
15 office, and there was a strange  
16 dynamic between Jill, Stephanie, and  
17 the Governor where like -- I think  
18 this existed before COVID, but Jill  
19 was like the ultimate punching bag in  
20 a lot of ways and took a lot of crap.  
21 Where like Stephanie and Melissa work  
22 very hard but Jill got like the brunt  
23 of the crap, and it was hard for me to  
24 like -- I think I'm having a hard day  
25 and then I see Jill who like everyone

1 C. Bennett

2 in the office represents, which is  
3 also saying a lot in that office.  
4 People don't necessarily have to love  
5 you and like people like really stand  
6 by Jill, see her walk in and be like  
7 do I have permission to go into the  
8 Governor's office [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
9 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
11 [REDACTED] and that made me sad.

12 And then I don't know how I  
13 found out that she like [REDACTED] [REDACTED] [REDACTED]  
14 [REDACTED]. I think it may have been  
15 even after there were rumors that she  
16 was leaving around when I met with her  
17 last, but I don't think I knew it was  
18 about [REDACTED] [REDACTED] until the day I had  
19 stated my PTO.

20 Q. Have you heard from anybody  
21 about whether she's going to return from  
22 her [REDACTED] leave?

23 A. Just a lot of guessing that she  
24 won't.

25 Q. And after you had your

1 C. Bennett

2 conversation with Jill, did you move out  
3 of New York?

4 A. I, a few weeks after, got a very  
5 small contract, so I had to end my PTO,  
6 handed in my phone, and then like a week  
7 or two later I left the state and was  
8 living in [REDACTED] until April.

9 Q. And what work have you been  
10 doing since you left the government?

11 A. I received a very small contract  
12 to help a startup with a client and the  
13 CEO, it was just her, there are no  
14 employees, she just has independent  
15 contractors and I was one of them. She  
16 asked me to stay and help her with the  
17 business, so now it's the two of us and  
18 it's a consulting firm and we work to  
19 improve health systems and introduce  
20 maternity care options into health systems  
21 to improve outcomes for birthing people.

22 Q. After the conversations you just  
23 described with Ms. Desrosiers and Ms.  
24 Mogul, have you had any contact with  
25 either of them since?

1 C. Bennett

2 A. No.

3 Q. After you left, did anyone who  
4 was still at Chambers reach out to you?

5 A. Yes.

6 Q. Who reached out to you?

7 A. I heard from -- I think I spoke  
8 with [REDACTED], I spoke to [REDACTED], I  
9 think I spoke to [REDACTED]. When [REDACTED] saw  
10 Lindsey's tweets, we talked on the phone.  
11 I think I had brief conversations with  
12 others that I'm not remembering right at  
13 this moment. And then when my New York  
14 Times story came out, I received texts  
15 from like a larger group, but it wasn't --  
16 nothing like so substantive more, just  
17 like support you texts.

18 Q. After Lindsey Boylan started  
19 tweeting in December, did anyone who's  
20 current or former employee of the  
21 Executive Chamber reach out to you about  
22 any sort of response to Lindsey?

23 A. No one that wasn't a friend like  
24 [REDACTED] getting on the phone with me to  
25 discuss what's going on. But there was no



1 C. Bennett

2 outreach from any party or any of the what  
3 I read in the news about efforts to  
4 diminish her.

5 Q. Did anyone who you were friendly  
6 with tell you that they had gotten a call  
7 asking to sign on to any statement either  
8 in support of the Governor or against  
9 Lindsey?

10 A. No.

11 Q. Did -- you said you reached out  
12 to Lindsey in December.

13 How did you reach out to her?

14 A. I messaged her on Twitter, and  
15 then she sent me her phone number and we  
16 texted and her -- some staffer of hers  
17 scheduled a phone call, and then we spoke  
18 over the phone maybe that same week even.  
19 And then we spoke several more times. And  
20 I -- she wanted me to share my story, I  
21 didn't want to share my story, but like we  
22 stayed in contact, you know, like we'll  
23 share news stories and stuff. Yeah,  
24 several times I think she really wanted me  
25 to come forward, and I did not want to

1 C. Bennett

2 come forward.

3 Q. When you reached out to Lindsey,  
4 did you share with her your story?

5 A. Yes.

6 Q. Did she ever ask you to meet  
7 with any lawyers?

8 A. Yes.

9 Q. And did you agree to meet with  
10 the lawyers that she wanted you to meet  
11 with?

12 A. I scheduled a Zoom with lawyers  
13 and then cancelled it.

14 Q. And did Lindsey tell you what  
15 the purpose was of speaking to a lawyer at  
16 that point?

17 A. I don't even know if she said  
18 why. I think she framed it as me sharing  
19 my story. But the fact that there were  
20 lawyers that like reached out to me really  
21 freaked me out, and I kind of, in a  
22 scared, submissive way, scheduled the Zoom  
23 and then I talked with [REDACTED] and  
24 she was like if you feel weird about  
25 something, don't do it, and I was like I

1 C. Bennett

2 can't make this meeting.

3 Q. Did the lawyers tell you what  
4 they were reaching out to you for, what  
5 the purpose was of that Zoom call?

6 A. They wanted to know my story. I  
7 didn't even tell Lindsey in much detail,  
8 just a brief -- it was relatively brief.  
9 But they seemed very pushy to hear what I  
10 had to say.

11 Q. Do you recall who those lawyers  
12 were?

13 A. Doug Wingdor [sic].

14 Q. Wait, Wigdor?

15 A. Yes.

16 And then there was a woman on  
17 the e-mail chain who also -- they sent me  
18 very kind of long -- not super long, but  
19 they sent me follow-up e-mails being like  
20 -- it felt like a scare tactic to get on  
21 the phone with them.

22 Q. You mentioned that, when Lindsey  
23 first started tweeting, you spoke to [REDACTED]  
24 [REDACTED].

25 What did the two of you say

1 C. Bennett

2 about Lindsey's tweets?

3 A. I remember [REDACTED] [REDACTED]  
4 mentioning Lindsey, and I knew that they  
5 had overlapped in Chamber when I had not  
6 with Lindsey. So I reached out, just  
7 being like -- it was kind of the same  
8 thing I did with [REDACTED], like what's  
9 Lindsey's deal, and we kind of had a  
10 series of texts about who is Lindsey  
11 Boylan.

12 Q. And what did [REDACTED] tell you  
13 about her interactions with Lindsey or  
14 what she knew about Lindsey?

15 A. She confirmed part of what I  
16 remembered, which is that she did have  
17 trouble with the senior staff women and  
18 that there was some issue between the  
19 Governor liking pretty women and senior  
20 staff not taking to her.

21 THE VIDEOGRAPHER: Counsel, I'm  
22 sorry to interrupt, but at some point,  
23 I don't need a break, but just to go  
24 off the record for a few seconds to  
25 manage the size of the video file.

1 C. Bennett

2 MS. CLARK: Okay. We can go off.

3 THE VIDEOGRAPHER: Thank you.

4 The time is approximately 5:06

5 p.m.

6 We are going off the record.

7 (Whereupon a break was taken)

8 THE VIDEOGRAPHER: The time's

9 approximately 5:37 p.m.

10 We're back on the record.

11 Q. Now, you mentioned that, when  
12 you were working up in Albany, you shared  
13 an office with the other executive  
14 assistants, and one of them was Alyssa  
15 McGrath.

16 When you were still working for  
17 the Chamber, did she ever tell you of any  
18 experiences she had with the Governor?

19 A. No.

20 Q. Has she got in touch with you  
21 since you came public with your story?

22 A. Yes.

23 Q. And what discussions have you  
24 had with Alyssa McGrath?

25 A. She was struggling to come

1 C. Bennett

2 forward and contacted me, shared some of  
3 the details of her own account, and asked  
4 me what the experience was like, and I  
5 explained that, in some ways, it --  
6 sharing the truth was obviously painful  
7 and there's a whole traumatic element to  
8 that, but sometimes saying the truth that  
9 you need to share is actually freeing you  
10 in a way and I didn't want her to be  
11 scared, and just kind of like giving her  
12 the support she was looking for in that  
13 moment. And we've just, since then,  
14 exchanged like kind of like love and  
15 support for each other.

16 Q. And by the way, I know when you  
17 first got in touch with Lindsey, you  
18 didn't want to go public with your story.

19 What made you decide to change  
20 your mind?

21 A. Every reason I had to not tell  
22 the story was just not good enough. I  
23 feel like the reason why I'm -- I was even  
24 working for the State of New York was to  
25 actually better the State of New York, and

1 C. Bennett

2 if this is part of that journey, then so  
3 be it. New Yorkers deserve to know who  
4 they're electing, and I also just needed  
5 to do the right thing and it felt like  
6 exactly the right thing to do.

7 Q. When you were at the Chamber,  
8 did you work with anyone named Kaitlin?

9 A. Last name -- I worked with a  
10 Kaitlin but I don't know if it's the one  
11 to which you're referring.

12 Q. There's some stories identifying  
13 somebody named Kaitlin.

14 Do you believe you overlapped  
15 with that Kaitlin?

16 A. I did not overlap with that  
17 Kaitlin.

18 Q. And have you had any  
19 communications with that Kaitlin since you  
20 went public?

21 A. I did, yes.

22 Q. And what were your  
23 communications with Kaitlin?

24 A. Very similar, talking about our  
25 respective experiences and supporting each

1 C. Bennett

2 other in whatever decisions we needed to  
3 make. I feel like my not job or  
4 responsibility but like in that space with  
5 someone else, it's like really just --  
6 like I want them to do what feels good and  
7 right for them, and I just also need to  
8 hear them they can survive sharing that  
9 information with the public and that the  
10 other side is scary, but like I'm still  
11 here and Lindsey's still here and that  
12 people will always support you. I just  
13 try to be really clear in that there is an  
14 entire group of people that fully believe  
15 what we're saying because it's true, but  
16 it's scary. I'm just holding space.

17 Q. And have you spoken with any  
18 other current or former executive  
19 assistants of the Governor's to see what  
20 their experiences were or talk about your  
21 experiences?

22 A. I reached out to -- I reached  
23 out to I think Executive Assistant #2, I believe Brittany,  
24 the woman who replaced me in New York  
25 City, her name is [REDACTED]. [REDACTED] said she



1 C. Bennett

2 didn't have any experiences. Brittany  
3 never responded. And [REDACTED] never  
4 responded.

5 Q. And am I correct that you did  
6 not overlap with Ana Liss?

7 A. Correct, I did not overlap.

8 Q. Have you had any communications  
9 with Ana Liss since you became public?

10 A. I think so, very briefly. I  
11 don't have too much. It was kind of like  
12 support you, very basic. I don't remember  
13 any outstanding.

14 Q. Since you went public with your  
15 story, have any other women come forward  
16 to tell you about experiences they had  
17 with the Governor that we haven't talked  
18 about already?

19 A. No.

20 Q. Did you have any interactions  
21 with other men in the Executive Chamber  
22 that you thought were inappropriate,  
23 anyone other than the Governor?

24 A. Yes.

25 Q. And which men was that?

1 C. Bennett

2 A. I guess, when you say  
3 "inappropriate," are you speaking  
4 specifically about sexual harassment?

5 Q. More broadly inappropriate.

6 A. I had an argument -- I wouldn't  
7 even say it was an argument, it was a  
8 really demeaning call in which I realized  
9 I -- it felt baked-in sexism to me with  
10 [REDACTED] [REDACTED] who works in D.C. and  
11 has worked with the Governor for a long  
12 time. I told Jill about that. And he was  
13 just miserable to work with. And when I  
14 asked him for the things that he was  
15 supposed to do as a part of his job and a  
16 part of mine, he got me on the phone and  
17 like went after me, and I largely saw it  
18 as dismissive because of my age and my  
19 gender.

20 Q. And what about the call that  
21 made you think it was dismissive in part  
22 because of your gender?

23 A. I said you need to let me know  
24 what's going on and you need to include me  
25 in these e-mail chains, and he basically

1 C. Bennett

2 told me I don't need to do anything you  
3 say. And I was like, well, you do,  
4 because this is how it works. And he said  
5 that no, and he said you should be  
6 thanking me for all the things I've done  
7 for you in this administration, just like  
8 I don't even work with him day-to-day,  
9 he's a D.C. guy. It was so out of left  
10 field and so deeply inappropriate, and I  
11 raised this to Jill just to be like this  
12 is inappropriate and it's difficult to do  
13 my job when he withholds information from  
14 me because he thinks I shouldn't be on an  
15 e-mail chain that Melissa DeRosa's on.  
16 It's just kind of the attitude.

17 Q. When did you have that call with

18 [REDACTED] ?

19 A. In June of 2020.

20 Q. And did you tell Jill about it  
21 around the time it happened?

22 A. Yes.

23 Q. And did you tell Jill that you  
24 thought he was being sexist or being  
25 dismissive because of your gender, or

1 C. Bennett

2 anything around those lines?

3 A. I don't think that explicitly,  
4 but I said I thought that it was  
5 inappropriate and that -- it wasn't the  
6 first time that he has been difficult, and  
7 I had heard other people explain -- I had  
8 heard people in the past relay comments  
9 that he had made to other groups of people  
10 to me. That was not answering your  
11 question.

12 I mostly kept it as like this is  
13 impossible to do my job with this  
14 behavior, and I thought it was really  
15 unprofessional.

16 Q. What was Jill Desrosiers'  
17 response when you told her about the call  
18 with [REDACTED] [REDACTED]?

19 A. She said she would fix it, and  
20 then Annabel sent out a chain and was like  
21 these people need to be on every e-mail,  
22 that kind of like going forward, let's be  
23 clear, you need to include these people on  
24 the information that you're sending  
25 because then we -- you know, it was just

1 C. Bennett

2 -- we find out at 9:00 p.m. something that  
3 they were planning a day prior and then  
4 you have to put together a briefing at  
5 9:00 p.m. at night because he decided I  
6 wasn't supposed to be on the e-mail chain?  
7 Sorry.

8 Q. Any other men that behaved any  
9 way that you considered to be  
10 inappropriate?

11 A. [REDACTED] [REDACTED] also comments on the  
12 bun that I wore on a different occasion  
13 and told me he didn't like how I changed  
14 my hair and I looked at a schoolteacher,  
15 and I remember telling people about it  
16 because I was so sick of people commenting  
17 on my bun.

18 Q. Did you say anything to him when  
19 he said it to you?

20 A. No.

21 Q. Any other men that behaved in  
22 any way you considered to be  
23 inappropriate?

24 A. Not that I can remember right  
25 now, no.

1 C. Bennett

2 Q. Did you have any interactions  
3 with a state police officer named [REDACTED]  
4 [REDACTED] or [REDACTED] that made you  
5 uncomfortable?

6 A. Yes. He had messaged me. The  
7 troopers were very nice to me, but he had  
8 made a point to reach out to me on social  
9 media, and I thought it was inappropriate.

10 Q. Why did you think it was  
11 inappropriate?

12 A. He was sending me emojis from  
13 his beach vacation.

14 Q. Did you ever tell anyone about  
15 Trooper [REDACTED] behavior?

16 A. Just [REDACTED] Staffer #8.

17 Q. And did [REDACTED] Staffer #8 suggest you take any  
18 action?

19 A. No.

20 Q. And did you ever report it or  
21 complain to anybody about it?

22 A. No.

23 Q. Any other men that behaved in  
24 any way that made you uncomfortable or you  
25 thought was inappropriate?

1 C. Bennett

2 A. During COVID, I had a larger  
3 issue with the breakdown of  
4 responsibilities and the way that certain  
5 people were behaving, and it's I think  
6 less about names because I actually was  
7 friends with those people, but I thought  
8 that I was largely the same age and  
9 similar experience to the men in the  
10 office, but they were all in a room  
11 working on content and PowerPoints and  
12 data and I was printing that for them to  
13 deliver it. I had a larger problem with  
14 the roles in which we were placed and the  
15 respect that we were given.

16 Q. And do you have a sense as to  
17 who made the decision that someone like  
18 you would be the one doing the clerical  
19 work and that the men would be working on  
20 the substance?

21 A. It seemed to come from senior  
22 staff and the Governor. It seemed it was  
23 baked in the same misogyny that, you know,  
24 there was an expectation that I wear  
25 heels. It felt like we had gone back a

1 C. Bennett

2 few decades in some ways.

3 Q. Other than things you've already  
4 testified to, did anyone engage in any  
5 sexually inappropriate conduct in the  
6 workplace?

7 A. Not that I could remember right  
8 now.

9 Q. If you could turn to tab  
10 thirty-three.

11 A. Oh, my God. I'm sorry.

12 Q. This is an exchange -- another  
13 exchange between you and Slater #5 September 23,  
14 2019.

15 Do you recall what the two of  
16 you were talking about in this exchange?

17 A. Yes.

18 Q. What were you talking about?

19 A. There was a conference call in  
20 which there was someone seemingly having  
21 sex -- and these conference calls are  
22 large and almost everyone is on mute, but  
23 there was someone having sex and people  
24 were just continuing to talk over the sex,  
25 and it was the talk of the office for a



1 C. Bennett

2 bit, obviously.

3 Q. And did you have any belief or  
4 understanding as to who the person was who  
5 was having sex while on a conference call?

6 A. I still believe it was Senior Staffer #3.  
7 That was the theory and the gossip at the  
8 time. But I did not receive any  
9 confirmation of this.

10 Q. Was the Governor on the call?

11 A. No.

12 Q. Was Jill Desrosiers on the call?

13 A. Yes.

14 Q. Was Stephanie Benton on the  
15 call?

16 A. Hard to say. I'm not sure. She  
17 doesn't join every call.

18 Q. Was Melissa DeRosa on the call?

19 A. She rarely joins.

20 Q. Who else do you recall was on  
21 that call?

22 A. Senior Staffer #3 was definitely on the  
23 call, Jill was definitely on the call,  
24 Staffer #4 was on the call, most  
25 people, you know, it's me, my team, the

1 C. Bennett

2 advanced team, press usually on that call.  
3 But usually the people speaking are senior  
4 staff.

5 Q. When you say, "press," you mean  
6 the Governor's press team?

7 A. Yes. That's a clarifying point.

8 Q. I think we would have read about  
9 that by now.

10 A. I would hope so.

11 MS. CLARK: You can put that  
12 aside.

13 Q. Did you ever see the Governor  
14 touch somebody, an employee, in a way that  
15 you thought was inappropriate for the  
16 workplace?

17 A. I cannot name a specific  
18 example, but I definitely remember him  
19 putting his waist -- his arm around a  
20 waist here and there. I remember there's  
21 one instance in which Melissa got dressed  
22 for a party or a fundraiser of some kind  
23 and there was like a stain on her butt and  
24 he pointed it out, and it was just kind of  
25 one of those bizarre moments, and she

1 C. Bennett

2 didn't really seem to -- she didn't seem  
3 uncomfortable or taken aback by the packet  
4 that he was like what's on your butt.

5 Q. Did he touch her at all when he  
6 made that comment?

7 A. I'm not sure.

8 Q. Did the Governor hug employees?

9 A. He definitely did.

10 Q. Was it men and women?

11 A. I highly doubt he was hugging  
12 men, but I don't know.

13 Q. Did you ever see him kiss any  
14 employees?

15 A. No, I don't believe so.

16 Q. Did you ever see the Governor  
17 hug or kiss people at events?

18 A. Nothing out of the ordinary  
19 jumps out for me.

20 Q. Did you ever hear the Governor  
21 say something to somebody else that was  
22 sexually suggestive?

23 A. I feel like there was a lot of I  
24 would almost say locker room talk but with  
25 the mean girls.

1 C. Bennett

2 Q. What do you mean by that?

3 A. Where I feel like they would  
4 have conversations about their lives and  
5 relationships with him and each other  
6 where it almost sounded like a group of  
7 friends talking.

8 Q. And these are conversations that  
9 you overheard or were present for?

10 A. Yeah, I was usually sitting at  
11 my desk.

12 Q. Did anyone ever tell you that  
13 the Governor had touched them in a way  
14 that made them uncomfortable?

15 A. No, but somebody at some point  
16 mentioned to me that there may be a photo  
17 of somebody sitting on his lap, and that  
18 -- I don't have the name of the person  
19 sitting or the person who mentioned the  
20 photo.

21 Q. That was something you were told  
22 while you still worked for the Chamber, or  
23 later?

24 A. I believe it was when I still  
25 worked for the Chamber, and it may have

1 C. Bennett

2 been even in response to me asking about  
3 the relationship between some of these  
4 people.

5 Q. The person that you heard there  
6 was a photo of them sitting on the lap,  
7 was it one of the women that you thought  
8 might have had a relationship with the  
9 Governor?

10 A. I think so. I suspect it was  
11 Senior Staffer #3 or Senior Staffer #2, but I'm not sure.

12 Q. You mentioned, and I forget who  
13 told you this, that somebody, when you  
14 first switched to the executive assistant  
15 position, talked about working for an  
16 executive who threw things.

17 Did you ever see the Governor  
18 throw anything at anyone?

19 A. No.

20 Q. Did anyone ever tell you about  
21 the Governor throwing anything at anyone?

22 A. No.

23 Q. Did you ever see the Governor  
24 throwing fruit around the office?

25 A. Nothing comes to mind. But I'm

1 C. Bennett

2 very -- it's possible, but nothing that  
3 jumps out at me.

4 MS. CLARK: Joon or Emily or Jen,  
5 anyone have any other questions before  
6 I move to wrapping up?

7 MR. KIM: Not from me, no, thank  
8 you.

9 Q. I know we covered a lot today,  
10 and there's times you jumped in and  
11 referred back to something you said  
12 earlier.

13 Is there anything else you can  
14 think of right now that you want to  
15 clarify something you said earlier today?

16 MS. KATZ: Can we take a break  
17 for just a moment before you close the  
18 record?

19 MS. CLARK: Sure. Why don't we  
20 take five minutes now.

21 MS. KATZ: Charlotte, if you have  
22 anything to say, but I just want to  
23 touch base before we close.

24 THE WITNESS: I feel like --  
25 well, the one thing I do want to

1 C. Bennett

2 clarify is the sexual harassment  
3 training that Stephanie took for the  
4 Governor, and just that I don't know  
5 if I like did justice in that, like I  
6 explicitly heard her say I'm taking  
7 this for you as part of the  
8 conversation they were having when I  
9 was sitting at my desk, and I feel  
10 like that was not explicit enough.

11 But that was my only -- the  
12 other instance I remember, this was  
13 very early on, it may have even been  
14 the same say as Danny Boy, he was  
15 running around the office with his  
16 finger like this (indicating) yelling  
17 "redrum" like in The Shining. If  
18 we're talking about kind of like  
19 outlandish behavior, that comes to  
20 mind.

21 MS. CLARK: And for the court  
22 reporter -- the video will capture it,  
23 but you had your finger crooked like  
24 in The Shining.

25 Debbie, do you still want to

1 C. Bennett

2 take a five-minute break?

3 MS. KATZ: Yeah, I just want to  
4 touch base and make sure there's  
5 nothing more.

6 THE VIDEOGRAPHER: Thank you.

7 The time is 6:00 p.m., and we're  
8 going off the record.

9 (Whereupon a break was taken)

10 THE VIDEOGRAPHER: The time is  
11 approximately 6:08.

12 We're back on the record.

13 Q. Any other things we talked about  
14 that you want to clarify at this point?

15 A. Not at this point, no. I  
16 feel --

17 Q. And I told you at the outset if  
18 there's any statement you wanted to add,  
19 whether it's something we talked about or  
20 not, you're free to do so now. You don't  
21 have to, but you have the opportunity if  
22 you'd like to.

23 A. I didn't think about that, but  
24 now that you're saying it, I think my main  
25 statement relates to the developments over



1 C. Bennett

2 the last few months as it relates to the  
3 Governor's comments about the  
4 investigation, and just my concern  
5 watching as he diminishes the work that  
6 you're doing and just want to make note of  
7 the comments and behavior that we're  
8 seeing from him.

9 That's all.

10 Q. And anything in particular you'd  
11 like to say regarding the Governor's  
12 comments and behavior?

13 A. I think diminishing the  
14 investigation, making it something  
15 political when it simply isn't, and the  
16 fact that he was at one point asking  
17 everyone to wait for the findings of this  
18 investigation and now is simply saying  
19 that we shouldn't have any faith in them,  
20 and then he goes back and forth, back and  
21 forth, it makes my job, my actual job  
22 really hard, it makes my life really hard,  
23 and it's simply unenjoyable that he can  
24 just choose to ruin my day because he  
25 decides to spew bullshit in the middle of

1 C. Bennett

2 a press conference, but also that it is  
3 simply damaging to the investigation and  
4 not the findings but just it's scary. As  
5 a witness, that scares me, and that's all  
6 I'll say.

7 MS. KATZ: Maybe you want to tell  
8 her why.

9 THE WITNESS: Why it scares me?

10 Q. Yes.

11 Why does it scare you?

12 A. It seems like he -- he has a  
13 platform and he has a lot of power, and  
14 making comments like that actually is  
15 interfering with really important and good  
16 work.

17 Q. Have any women told you that  
18 they are concerned as witnesses about the  
19 Governor's comments or women who have  
20 thought about coming forward and are  
21 afraid to do so given the Governor's  
22 comments?

23 A. Alyssa reached out to me after  
24 we released a statement. This was when  
25 the Governor said that making someone

1 C. Bennett

2 uncomfortable is not sexual harassment and  
3 Debbie and I responded appropriately, and  
4 Alyssa reached out to me afterwards saying  
5 thank you for standing up for us.

6 MS. CLARK: Thank you for your  
7 time today.

8 If you get any additional  
9 information, I'm a sure you'll share  
10 it with your attorney who will share  
11 it with us.

12 I want to remind you again that,  
13 if anyone asks you about what we  
14 talked about today, you have let us  
15 know, and are that you're not to share  
16 with us anything that you discussed.  
17 That's separate from discussing your  
18 underlying issues.

19 And again, just thank you for  
20 spending the time with us and talking  
21 about things that we know aren't easy  
22 to talk about.

23 THE WITNESS: Thank you.

24 THE VIDEOGRAPHER: May I close  
25 out the deposition for today?

1 C. Bennett

2 MS. CLARK: Yes.

3 THE VIDEOGRAPHER: Thanks,  
4 everyone.

5 We are off the record at 6:12  
6 p.m., and this concludes today's  
7 testimony given by today's witness of  
8 May 26, 2021.

9 The total number of media units  
10 used was five, and will be retained by  
11 Veritext New York.

12 Thanks, everyone.

13 (TIME NOTED: 6:12 p.m.)

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WITNESS

EXAMINED BY

PAGE

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C. Bennett

Ms. Clark

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CERTIFICATION BY REPORTER

I, Wayne Hock, a Notary Public of the State of New York, do hereby certify:

That the testimony in the within proceeding was held before me at the aforesaid time and place;

That said witness was duly sworn before the commencement of the testimony, and that the testimony was taken stenographically by me, then transcribed under my supervision, and that the within transcript is a true record of the testimony of said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, that I am not interested directly or indirectly in the matter in controversy, nor am I in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 1st day of June, 2021.

*Wayne Hock*